

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW
Peter A. Schey (Cal. Bar No. 58232)
Carlos Holguín (Cal. Bar No. 90754)
256 South Occidental Boulevard
Los Angeles, CA 90057
Telephone: (213) 388-8693
Facsimile: (213) 386-9484
Email: pschey@centerforhumanrights.org
crholguin@centerforhumanrights.org

ORRICK, HERRINGTON & SUTCLIFFE LLP
Elena Garcia (Cal. Bar No. 299680)
egarcia@orrick.com
777 South Figueroa Street, Suite 3200
Los Angeles, CA 90017
Telephone: (213) 629-2020

Attorneys for plaintiffs (listing continues on following page)

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JENNY LISETTE FLORES, <i>et al.</i> ,)	Case CV 85-4544 DMG-AGR _x
)	
Plaintiffs,)	EXHIBITS IN SUPPORT OF
)	PLAINTIFFS' MOTION TO
- vs -)	ENFORCE THE SETTLEMENT
)	AGREEMENT[REDACTED
WILLIAM BARR, ATTORNEY)	VERSION OF DOCUMENT
GENERAL)	PROPOSED TO BE FILED
OF THE UNITED STATES, <i>et al.</i> ,)	UNDER SEAL] VOL. 4 OF 5
)	
Defendants.)	[HON. DOLLY M. GEE]

///

1 *Plaintiffs' counsel, continued:*

2 LA RAZA CENTRO LEGAL, INC.
3 Michael S. Sorgen (Cal. Bar No. 43107)
4 474 Valencia Street, #295
5 San Francisco, CA 94103
6 Telephone: (415) 575-3500

7 THE LAW FOUNDATION OF SILICON VALLEY
8 LEGAL ADVOCATES FOR CHILDREN AND YOUTH
9 Jennifer Kelleher Cloyd (Cal. Bar No. 197348)
10 Katherine H. Manning (Cal. Bar No. 229233)
11 Annette Kirkham (Cal. Bar No. 217958)
12 4 North Second Street, Suite 1300
13 San Jose, CA 95113
14 Telephone: (408) 280-2437
15 Facsimile: (408) 288-8850
16 Email: jenniferk@lawfoundation.org
17 kate.manning@lawfoundation.org
18 annettek@lawfoundation.org

19 NATIONAL CENTER FOR YOUTH LAW
20 Leecia Welch (Cal. Bar No. 208741)
21 Neha Desai (Cal. RLSA Bar No. 803161)
22 405 14th Street, 15th Floor
23 Oakland, CA 94612
24 Telephone: (510) 835-8098
25 Email: lwelch@youthlaw.org
26 ndesai@youthlaw.org

27 U.C. DAVIS SCHOOL OF LAW
28 Holly S. Cooper (Cal. Bar No. 197626)
One Shields Ave. TB 30
Davis, CA 95616
Telephone: (530) 754-4833
Email: hskooper@ucdavis.edu

PLAINTIFFS' MOTION TO ENFORCE CV 85-4544-DMG(AGRX)

1 *Of counsel:*

2 YOUTH LAW CENTER
3 Virginia Corrigan (Cal. Bar No. 292035)
4 832 Folsom Street, Suite 700
5 San Francisco, CA 94104
6 Telephone: (415) 543-3379
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

28 PLAINTIFFS' MOTION TO ENFORCE CV 85-4544-DMG(AGRX)

INDEX OF EXHIBITS

VOL. 1

1. Declaration of Peter Schey	1
2. Declaration of Hope Frye	8
3. Excerpts of Flores Class Member Declarations	15
4. Office of Refugee Resettlement Unaccompanied Minors Policies	43
5. N.E. Wang, Emergency Medicine and Pediatrics at Stanford, Stanford Human Rights in Trauma Mental Health Program, <i>2018 Individual Program Report: Homestead</i> (April 11, 2019)	52
6. Declaration of Dr. Marsha Griffin	67
7. Declaration of Dr. Ryan Matlow	84
8. The New England Journal of Medicine, Reducing Protections for Noncitizen Children — Exacerbating Harm and Trauma (November 21, 2018)	104
9. Omitted	

VOL. 2

10. Deposition of K [REDACTED], ORR Federal Field Specialist, <i>Lucas R v. Azar</i>	108
---	-----

VOL. 3

11. Declaration of E [REDACTED] L [REDACTED]	337
12. Declaration of J [REDACTED] Q [REDACTED]	341
13. Declaration of M [REDACTED] D [REDACTED]	346
14. Declaration of Y [REDACTED] M [REDACTED]	351
15. Declaration of C [REDACTED] M [REDACTED]	355
16. Declaration of C [REDACTED] A [REDACTED]	359
17. Declaration of D [REDACTED] O [REDACTED]	363
18. Declaration of E [REDACTED] G [REDACTED]	366

1	19.Declaration of H [REDACTED] Z [REDACTED]	369
2	20.Declaration of J [REDACTED] M [REDACTED]	373
3	21.Declaration of J [REDACTED] A [REDACTED]	377
4	22.Declaration of K [REDACTED] M [REDACTED]	380
5	23.Declaration of K [REDACTED] D [REDACTED]	384
6	24.Declaration of M [REDACTED] G [REDACTED]	388
7	25.Declaration of M [REDACTED] Y [REDACTED]	392
8	26.Declaration of M [REDACTED] A [REDACTED]	395
9	27.Declaration of M [REDACTED] G [REDACTED]	398
10	28.Declaration of N [REDACTED] G [REDACTED]	401
11	29.Declaration of N [REDACTED] J [REDACTED]	404
12	30.Declaration of D [REDACTED] A [REDACTED]	408
13	31.Declaration of O [REDACTED] D [REDACTED]	412
14	32.Declaration of S [REDACTED] D [REDACTED]	415
15	33.Declaration of S [REDACTED] G [REDACTED]	418
16	34.Declaration of C [REDACTED] A [REDACTED]	422
17	<u>VOL. 4</u>	
18	35.Declaration of D [REDACTED] L [REDACTED]	426
19	36.Declaration of E [REDACTED] A [REDACTED]	430
20	37.Declaration of E [REDACTED] Y [REDACTED]	433
21	38.Declaration of Y [REDACTED] M [REDACTED]	437
22	39.Declaration of G [REDACTED] M [REDACTED]	440
23	40.Declaration of M [REDACTED] J [REDACTED]	444
24	41.Declaration of N [REDACTED] R [REDACTED]	448
25	42.Declaration of M [REDACTED] Y [REDACTED]	453
26	43.Declaration of N [REDACTED] C [REDACTED]	457
27	44.Declaration of O [REDACTED] D [REDACTED]	461
28	45.Declaration of Y [REDACTED] A [REDACTED]	465
	PLAINTIFFS' MOTION TO ENFORCE CV 85-4544-DMG(AGRX)	

1	46.Declaration of M [REDACTED] A [REDACTED]	469
2	47.Declaration of A [REDACTED] H [REDACTED]	473
3	48.Declaration of J [REDACTED] N [REDACTED]	476
4	49.Declaration of H [REDACTED] S [REDACTED]	479
5	50.Declaration of E [REDACTED] I [REDACTED]	485
6	51.Declaration of G [REDACTED] N [REDACTED]	489
7	52.Declaration of D [REDACTED] A [REDACTED]	492
8	53.Declaration of S [REDACTED] N [REDACTED]	496
9	54.Declaration of D [REDACTED] J [REDACTED]	500
10	55.Declaration of H [REDACTED] M [REDACTED]	505
11	56.Declaration of B [REDACTED] M [REDACTED]	509
12	57.Declaration of C [REDACTED] G [REDACTED]	513
13	58.Declaration of N [REDACTED] P [REDACTED]	517
14	59.Declaration of D [REDACTED] H [REDACTED]	521
15	<u>VOL. 5</u>	
16	60.Declaration of E [REDACTED] G [REDACTED]	525
17	61.Declaration of A [REDACTED] A [REDACTED]	529
18	62.Declaration of A [REDACTED] B [REDACTED]	532
19	63.Declaration of L [REDACTED] M [REDACTED]	536
20	64.Declaration of N [REDACTED] E [REDACTED]	539
21	65.Declaration of J [REDACTED] A [REDACTED]	543
22	66.Declaration of J [REDACTED] D [REDACTED]	547
23	67.Declaration of J [REDACTED] P [REDACTED]	550
24	68.Declaration of I [REDACTED] P [REDACTED]	553
25	69.Declaration of J [REDACTED] J [REDACTED]	557
26	70.Declaration of E [REDACTED] J [REDACTED]	560
27	71.Declaration of K [REDACTED] D [REDACTED]	564
28	72.Declaration of J [REDACTED] N [REDACTED]	567

1	73.Declaration of R [REDACTED] A [REDACTED]	571
2	74.Declaration of E [REDACTED] E [REDACTED]	575
3	75.Declaration of R [REDACTED] F [REDACTED]	578
4	76.Declaration of M [REDACTED] N [REDACTED]	581
5	77.Declaration of M [REDACTED] U [REDACTED]	585
6	78.Declaration of A [REDACTED] E [REDACTED]	589
7	79.Declaration of D [REDACTED] N [REDACTED]	593
8	80.Declaration of Z [REDACTED] P [REDACTED]	598
9	81.Declaration of C [REDACTED] A [REDACTED]	602
10	82.Declaration of M [REDACTED] I [REDACTED]	606
11	83.Declaration of H [REDACTED] P [REDACTED]	609
12	84.Declaration of A [REDACTED] S [REDACTED]	612
13	85.Declaration of A [REDACTED] Q [REDACTED]	616
14	86.Declaration of K [REDACTED] M [REDACTED]	620

15 ///

Exhibit 35

Declaration of
D [REDACTED] L [REDACTED], A NUMBER [REDACTED]

I, D [REDACTED] L [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] and I am from Guatemala.
2. I came to the US with my father. We came in a car through the frontier, across the river and into the United States. I do not know why we came here but we came to stay with my dad's cousin.
3. I am not sure where we crossed into the US but as soon as we arrived we were taken to a place with large tents. I was separated from my dad. He went to the men's camp. There were no beds and we slept on the floor. They gave us tacos, apple juice, milk and cookies. There was not enough food. This was all we had for three days. It was very cold and all we had were thin silver thermal blankets.
4. On day three at the camp, I found out that my dad was gone. Although my dad was housed in a different area with the men, I had been able to see my dad. But I noticed that I could no longer see him. I asked the guard if they knew where my dad was and they told me that he had gone from the camp. I felt very sad and scared.
5. My father was deported to Guatemala approximately 19 days later.
6. The staff at the first camp gave me a phone to call my dad's cousin who lives in Ohio. But by the time we called him, he couldn't take me in.
7. I have been at the Homestead Facility for about 151 days. I feel a little ok being here because we have food and tv and on Saturdays I can go to church. We walk around in lines from our rooms to school and we are not allowed to leave. We cannot walk anywhere alone and we are not allowed to run. It would be a big problem if I tried to leave.
8. I have an uncle M [REDACTED] in Miami who is able to take me in. They have the paperwork but I don't know exactly when or what the next steps are. I know there are some form, and eighty-five days after I arrived here they completed the finger printing part of the background check. There is another document that must come from the government but I don't know when it will arrive. My case manager told me that there are 1 or 2 people ahead of me in line. They have been telling me for over a month that they need to wait for other people to leave first before it will be my turn. I ask why they say they have to go first, but they don't explain why they need to leave first. I asked my case manager when is it my turn to leave and she said to me that she has to get these two or three girls out first. A friend of mine has gone but I have not moved up the line. I have been here a long time and people who will have been here shorter periods of time are leaving before me. I do not know when I will be released, maybe it will be this week.
9. My uncle has already come to visit me once. We had a good visit and I would like to go and stay with him.
10. I haven't been in trouble here. I was told that if I got many reports against me then they would show it to the judge and it would make me look bad. We were told that if we got any reports then our reunification could be delayed. I am still here but I don't have any reports.
11. The staff here told me that they would try to look for an attorney for me, but if they couldn't then they told me that I would have to look for one myself. I am waiting for them to tell me whether they found an attorney for me.

12. I talk to my father twice a week sometimes for five and sometimes for ten minutes. We talk about patience and he asks for updates about my situation and what is going on with my uncle. Sometimes the case manager is with him when I make my call. I miss my dad.

I, D [REDACTED] L [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

26/10/18

Date

Certificate of Translation

I, DENISSE C. LAMAS, LCSW certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED] in Spanish. Executed this 24 of OCTOBER in HOMESTEAD, FLORIDA.



Denisse C. Lamas, LCSW
Executive Director
Hispanic Family Counseling
dlamas@hispafam.com

Exhibit 36

Declaration of
E [REDACTED] A [REDACTED] A NUMBER [REDACTED]

I, E [REDACTED] A [REDACTED] (A number [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from El Salvador.
2. One of the many reasons that I left El Salvador was that a violent gang in El Salvador, La Mara, was attempting to recruit me as a member. La Mara is at war with other gangs in El Salvador, and it is not safe there. I did not want to join the gang because it is dangerous. I know other people involved in gangs, who have been killed. I was afraid of what the gang would do to me and to my family if I refused to join. My parents talked and decided that my father and I should leave El Salvador and try to reach the United States, for my safety.
3. My father and I surrendered ourselves at the border near San Diego, California. We were held at two facilities for several days. The facilities were very cold and we called it the "hielera" or ice box. After eight days, my father was taken away. I did not know where he was going, or if he would be back. No explanation was given to me as to what was happening or why we were being separated. My father told me that he would be alright and not to worry. I found out later that my father is in Texas. It was my understanding that I would be sent to live with my Uncle in California and my father told me the same thing. However, a few days later, I was transported by plane to the facility in Homestead, Florida. Someone from the U.S. government gave me papers to sign, so that I could be taken to Florida. The papers were not explained to me, and I thought that I had to sign them. I signed the documents and was removed to the facility in Homestead. I have been here for 140 days.
4. I hope to be released to my uncle, a legal United States resident, who lives in Los Angeles, California. I have a case worker, and she told me that she is working on getting paperwork in order so that I can be released to my Uncle. I do not understand exactly why I am still at the Homestead facility. When I first arrived here, I was told that I would be reunited with my father, but that never occurred and I am not sure why. My case worker then told me that she is going to try to release me to my uncle. Other reunifications have occurred ahead of mine, but I am not sure why. My uncle's fingerprints came in over a week ago. I was told that I would be released after the fingerprints were received, but I am still waiting.
5. I speak to my father about five times since I got here and my mother about twice per week. I am allotted 10 minutes two times per week to speak to my family. The time has to be divided among my family members. For example, I talk to my mother for five minutes, I only have five minutes left to talk to my father.
6. I only see the clinician, or counselor, once every three weeks. I have only attended group counseling with the clinician once since I have been here.
7. I do attend church once per week, but I am not allowed to speak to the pastor.

8. It is my understanding that I am not free to move freely around the facility, and I cannot leave the facility grounds. If I were caught trying to walk outside of the facility, I would be moved to a different facility. I have seen other children at this facility who tried to escape. They were caught, returned to the facility and then moved somewhere else a few days later.

9. I have seen a few kids get into fights here at this facility. It is my understanding that those kids' cases and reunification get moved to the "back of the line." They miss their opportunity for reunification and have to wait until their behavior improves.

10. Sometimes, our rooms and belongings are searched. If a kid is caught with more than their allotted standard issue clothing, they get in trouble. If a kid is caught with an item that was not issued by the U.S. government, that item is taken. For example, I had a pair of sunglasses which I brought from home, and they were taken from me.

11. I do not have a lawyer assigned to me here at this facility.


I, E[REDACTED] A[REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

E[REDACTED] A[REDACTED]

10/23/18
Date

Certificate of Translation

I, DENISSE LAMAS, certify that I am fluent in English and Spanish and that I read the above declaration to E[REDACTED] A[REDACTED] in Spanish. Executed this 22nd of October in Homestead, Florida.



Denisse Lamas
Hispanic Family Counseling
6900 South Orange Blossom Trail
Suite 402
Orlando, FL 32809

Exhibit 37

Declaration of
E Y A NUMBER

I, E Y (A number , declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is I am from Yoro, Honduras.
2. I came to the United States 7 months ago with my father, We came on buses to the border and walked across and that is where I was apprehended.
3. When I arrived, I was taken to a facility in Texas, where I stayed for 7 days. I do not know the name of the place where we stayed. It was a very cold place. We slept on the floor. I was told to get rid of my clothes and then they gave me some new clothes.
4. I was with my father for a days in the facility and then we were separated and I have not seen my father since then. Five days later I was moved from Texas to Homestead. I did not speak to my father about it. I don't know the reason I was moved from Texas to Homestead. I have been here approximately 6 months.
5. My mother is in Honduras. My father is also now in Honduras. I can speak with my father on the telephone. I speak to my parents two times a week. We are allowed 10 minutes twice a week. I don't have enough time to talk with my parents
6. My uncles S and D who live in Georgia is willing to have me come to live with him. I have spoken to him over the phone. I have not had any visits from my uncle, I am not sure whether I can have visits.
7. My case manager is M and I talk to her when I go to use the phone. She has explained to me a little about the process for me to live with my Uncle but I don't know how long it will take. My uncles have completed all the paper work and submitted their fingerprints. My uncles have both submitted the finger prints but only one has come back so far. I feel I can't get enough information about my situation, my status and how I can leave here. I am not getting this information in the time I have.
8. I have not been given anything which explains the rules of being here. I haven't gotten anything in writing about my rights or the procedures here. I do not have an attorney.
9. I am treated well here. I do not fear for my physical safety. Nobody has hit or yelled at me while I have been here.
10. When I get sick I can see a doctor. The doctor speaks Spanish and I have been to see him around 11 times for headaches and been given medication like acetaminophen and a liquid that I don't know what it is to calm down my headaches.
11. I am woken up at 7 am and I brush my teeth and wait to be called for breakfast at 8am, we have 15 minutes to eat our food. I like the food here.
12. After breakfast, we go to school here at around 8:30 at the facility. In the schoolrooms, it is always very cold. I have one teacher but I can't remember his name. We have about one hour and a half in the class room and then we go out at 10 to play soccer. We are supervised by our YCs. We play soccer for about 1 hour and a half. Once we get back to the classroom it is time for lunch. We have 15 minutes to eat lunch.

13. We get back to the classroom after lunch and we study with our teacher. There are 12 students in my group and there are four groups in my class. We have 44 kids in each class with one teacher and one YC per group. My classroom group is aged 15-17 years old. We learn English, Mathematics, History.
14. We can get books to read from the library. The classes are taught in Spanish and translated into English. We can play soccer for an hour and a half at either 1 or 4 pm. We play soccer for 3 hours every day. We get snacks when we are going to the playground.
15. In our group room, there are 6 children on one side of the room and there are 6 kids on the other side of the room. We have a trunk to keep our personal belongings but it is not locked. Once a week they do a search of our belongings, but I don't know what they are looking for.
16. We have a toilet and a shower in the bathroom in our rooms for 12 people. We have towels, soap, shampoo. Our showers are very quick we only have 5 minutes to shower at 8 pm at night. We must lay or sit in our beds while others are showering.
17. I am wearing the same clothes that I arrived in and I have 5 pairs of underwear, 5 t-shirts and two of pairs of sweat pants. I have asked for more clothes but I have not been given any.
18. [REDACTED] is our counselor and she helps us. I see her two times a week.
19. We cannot leave this facility. They have told us that we cannot leave.

I, E [REDACTED] Y [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
E [REDACTED] Y [REDACTED]

24/10/18
Date

Certificate of Translation

I, MIGUEL A. PEREZ VARGAS certify that I am fluent in English and Spanish and that I read the above declaration to E [REDACTED] Y [REDACTED] in Spanish. Executed this 24 of OCTOBER in HOMESTEAD, FLORIDA.



MIGUEL A. PEREZ VARGAS
Multicultural Education, Training & Advocacy, Inc.
perezvargasmiguel@gmail.com

Exhibit 38

Declaration of

Y [REDACTED] C [REDACTED] A Number [REDACTED]

I, Y [REDACTED] C [REDACTED] (A number [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. One of many reasons that my family decided to leave Guatemala is that we are poor and we left out of necessity.
3. I traveled to the U.S. with my father. I did not completely understand what was happening. My father gave me instructions, and I followed his instructions. I entered the U.S. in Texas. When we reached the border, we were caught by border patrol. We were taken to an office by the immigration officials and we were told at that time that we would be separated. I have not seen my father since that time.
4. I was put onto an airplane that was full of kids. I did not know where I was going, why I was going there or if my father would be eventually be there to reunite with me. No one explained any of this to me. I arrived at the facility in Homestead, Florida. Based on what my social worker told me, I have now been here for 140 days.
5. My social worker told me that my father has been deported back to Guatemala. While my father was being detained in Texas, I was not able to speak with him and I did not know where he was. My father was detained in Texas for about one month. Once my father returned to Guatemala, I have been able to reach him and speak to him.
6. I am able to speak to my father twice per week, for 10-minute increments. Every time that I speak to my father, a case worker for the government is present and listening to what I say.
7. It is my understanding that my uncle, Serapio [REDACTED] is willing to take care of me if I am released to his care. My uncle is in the U.S. legally, and he lives in Texas. It is my understanding that not only my uncle, but also his wife, must submit their fingerprints before I can be released to my uncle. I am told that my uncle and his wife submitted their fingerprints at the same time. For reasons that I do not understand, my uncle's fingerprints have been received and processed by the government, but my aunt's fingerprints have not.
8. It is my understanding that I am not free to leave the Homestead facility. The children are also not allowed to be by themselves at any time. For example, we must ask for permission to go to the restroom and are watched as we enter and exit the bathroom. I think that if I tried to go outside of the facility's walls, it would be seen as me trying to escape and I would be sent back to Guatemala.

9. We are not able to walk around the facility freely or without being directly supervised. My actions, and the actions of the other children at the facility, are watched and monitored at all times.

10. Our showers at Homestead are also timed and limited to five minutes. We are reprimanded, and might even get a negative report, if our showers last for more than five minutes.

11. I do attend the evangelical Christian church service each week at the Homestead facility. However, I am not allowed to talk to the pastor. When I lived in Guatemala, I went to church every day and my uncle was the pastor. I was used to talking with my pastor all of the time, and I miss going to church every day.

12. It is my understanding that if I am reported for breaking any of the rules at the facility, I will get a "report." If I get a report, my case will be delayed and it will take longer for me to be reunited with my family.

13. My room, which I share with 11 other people, is searched about once every week. The last search occurred two days ago, but the guards did not find anything.

I, Y [REDACTED] C [REDACTED] of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
Y [REDACTED]

10/24/2018
Date

Certificate of Translation

I, DENISSE LAMAS, certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED] in Spanish. Executed this 24th of October in Homestead, Florida.



Denisse Lamas
Hispanic Family Counseling
6900 South Orange Blossom Trail
Suite 402
Orlando, FL 32809

Exhibit 39

Declaration of
G [REDACTED] M [REDACTED], A NUMBER [REDACTED]

I, G [REDACTED] M [REDACTED] (A number [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from El Salvador.
2. One of many reasons that my family decided to leave El Salvador was the presence of a violent gang in the area and threats of violence against me and my family. A violent gang called La Mara operates in El Salvador. Kidnappings have become very common there. I know of three other girls my age who have been kidnapped and killed by La Mara. When I switched schools in January 2018, a member of La Mara noticed me and wanted to date me. I did not return his feelings and I did not want to be involved with him. He told me that if I did not date him or submit to his sexual advances, he would hurt me and my family. I told my father that this had happened and that I was very scared that the gang member would follow through on his threats. My father decided that we should try to escape El Salvador for our safety.
3. I entered the U.S. in El Paso, Texas. I was traveling with my father, my aunt and two cousins. We traveled to the U.S. in a car. When we approached the El Paso River, we crossed it on a raft. We reached the other side and walked a short distance and immigration officials stopped us. We were taken to the ice box. I was immediately separated from my father, as they separated the group by male and female. We were kept at the ice box for one day.
4. Then, I was called to another facility that is known as "La Perrera", which means dog kennel in English. At that time, I did not know where my aunt or cousins were. Later, my cousins joined me at the "dog Kennel." A few days later, I was moved to my current facility in Homestead, FL. I was transported to Florida via airplane. I did not know where I was going or where I would end up. I was not provided any documents, and no one explained the process to me.
5. I have not seen my cousins since I left the dog kennel. It is my understanding that my cousins have been reunited with my aunt.
6. Both the ice box and the dog kennel were completely enclosed. I did not go outside or see the sun. I would go to sleep and wake up and assume that it was day time, but I wasn't sure. The only time I was permitted outside is when I was transported from facility to facility.
7. I was in the Homestead facility for about two months, when I was then sent to Texas. It was my understanding that I was going to be reunited with my father in Texas. I was there for one or two days, and I was told that I would not be reunited with my father. It was not explained to me why we could not be reunited or where he was. I was told that they could

not find my father, even though he is in the custody of the U.S. government. I was then sent back to the facility in Homestead. I still do not completely understand why I could not be reunited with my father in Texas.

8. My mother and uncles have already reached the U.S. and are living here. My mother is in Maryland. I do not know if she is in the U.S. legally.

9. My grandmother is in the U.S. legally, and she resides in California. I also have two other aunts who were born in the U.S. and are legal citizens.

10. My father remains detained in Texas. I last spoke to my father a few days ago. I spoken to him a few times since I have been here in Homestead.

11. I am able to use the phone twice per week. I am allotted 10 minutes to talk, which I must divide between my family members. For example, if I talk to my father for five minutes, I only have five minutes left to talk to my mother.

12. I was told that I have to specifically request an appointment with a counselor. I have to fill out a form and submit my request to meet with the counselor. I meet with the counselor about twice per week. Sometimes when I am sad, my friends here at the facility who request an appointment for me. Occasionally, counselors will talk to us in a group at school and ask how we are doing.

13. It is my understanding that if my father remains in the U.S., I will be sent to live with my grandmother in California. If my father is not permitted to remain in the U.S., I will be sent to live with my mother in Maryland. I do not know when we will have an answer as to whether my father will be allowed to remain here. I do not know what why it is taking so long to make that decision, or the reasons for the delay. I am very worried about being sent to live with my mother, because I do not know her well and she has not been involved in my life. I do not understand why I cannot be released to my grandmother who is in California and who is in the U.S. legally. It is my understanding that my grandmother must submit her fingerprints in order for me to be placed with her in California. It is my understanding that my grandmother submitted her fingerprints back in July, but yet I still am not allowed to be placed with her as of yet. These issues have not been explained to me by anyone at the Homestead facility. I have no idea if or when I will be reunified with my family members.

14. It is my understanding that I am not allowed to leave the Homestead facility. If I tried to walk outside, they would say that I am trying to escape and I might get in trouble.

15. We are not able to walk around the facility freely or without being directly supervised. For example, if I need to use the bathroom, I have to ask permission and be accompanied to the bathroom. Our showers are also timed and limited to five minutes.

16. Some of my personal belongings (clothes, jewelry) were taken from me when I arrived here. I hope that my items will eventually be returned to me.

17. I do attend the evangelical Christian church service each week at the Homestead facility. However, I am not allowed to talk to the pastor. This makes me sad because I used to attend church twice per week and I miss talking with a pastor.

18. If one of the workers here were to hurt me or scare me while I am here, I am not sure who to tell or how to handle it. No one at the Homestead facility has explained that to me.

19. If I see one of the children breaking a rule, I am worried and reluctant to say anything. All of the children here are in a bad situation, and I do not want to make anyone's situation worse. I am afraid if I report wrongdoing, that person's case might be negatively affected, and it might hurt their ability to reunite with their family. I have been told that if any of the kids at this facility have a record of bad behavior, it will hurt their court case and they will not be reunited with their families.

I, G [REDACTED] M [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

23/20/2018

Date

Certificate of Translation

I, DENISSE LAMAS, certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED] in Spanish. Executed this 23rd of October in Homestead, Florida.

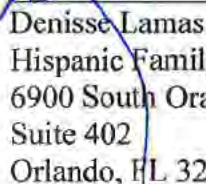

Denisse Lamas
Hispanic Family Counseling
6900 South Orange Blossom Trail
Suite 402
Orlando, FL 32809

Exhibit 40

#27162

Declaration of
 M. [REDACTED] J. [REDACTED] A NUMBER [REDACTED]

I, M. [REDACTED] J. [REDACTED] A number [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala, aldea Barillas my language is Q'anjoba'al
 2. I came to this country with my father [REDACTED] he is detained in immigration, the last time I talked to him was 20 days ago. I have been here in this facility for around 4 months since June 8, 2018. I left Guatemala because I did not have a house and I had to work in the field, clean the fields with a machete. They came with a coyote and I was separated from my father in immigration. One of the reasons I left Guatemala was because I did not have anything to eat, I did not get paid enough to buy food he was paid 25 quetzals and that would only work to pay a pound of beans, I was robbed when I was in Mexico coming here, they robbed us at gunpoint.
 3. I was apprehended by myself and then my father [REDACTED] came the next day. We presented ourselves at the border on or about JUNE, 2018. My father nor I had a birth certificate to show relationship the officer just looked at us I did not know that he said because I did not understand Spanish, nobody talked in my dialect, we asked for a phone call and we were told that we could not. After 3 days, I was separated from my father and I do not the name of the facility where I was held but stayed there for 4 days and then they took me to an airport. I had water at that facility but not food, only crackers, no hot food, I slept in the floor, there were only kids there, I only took a bath once in the four days I stay there. In the same room slept 20 persons. There was a bathroom in the room but I did not li to go while everybody was awake, I waited until they were sleep. I was very cold there.
 4. After 4 days, they took me to the airport. They let me know the night before that we were leaving to another facility. I found out because three of the people detained with me talk my dialect and told me. was taken to here in Homestead. I did not know where we were going, they just said Miami.
 5. I have been at the Homestead facility for about 138 days. At the orientation they told us the rules, it v not in my language but some people who speaks it let me know. They gave us a book of 4 pages. My social worker told me about an attorney but I haven't seen him in 3 months. I feel good here in this facility, they give me food but sometimes I do not like to eat because it is the same all the time, there no variation, I have not told anybody about that. They feed me 3 times a day. The temperature is ok. Right now, I have athlete's foot because I wear shoes here and they treat me twice a day with spray/cream. But the doctor does not speak my language. I can speak Spanish but sometimes I don't understand.
- I wake up at 7 am, wash my teeth, I stay at my bed, which is comfortable. I wait for the supervisor breakfast, at 8 am. Then we go to school but the teacher does not say anything, do not do anything, only writes something in the board and that's it, I don't understand most of the time I am not learni

anything. Other students sleep in the class and she does not say anything. This is the teacher I have since 20 days ago. After school we watched a movie, and then have dinner.

There are 12 kids in each room, the bathroom is small but everything is clean, the kids in my room are about my age. We have to turn off the lights at 10pm. I cannot take books to the bed since a week ago, they took all of that, books, colors, papers. I had an English book and they took it out a week ago, they did not tell me why. If I have too many clothes or shoes, they took them out. I do not have my own clothes, some Mexican guy with a gun took my stuffs, they stole from us when we were in Mexico.

I can go to church on Saturdays and Sundays. The same religion I practiced in my country.

Kids who do not behave receive a report. I was hit by a kid once and he received a report and he was transferred to another shelter, but I also received a report even though the other kid was the one bothering because the supervisor said that the report should be for both. I did not receive punishment. Even though I changed rooms and the kids in my room are new, I sometimes am afraid and I am afraid of talking to the supervisor because he does not speak my dialect. The supervisor did not want to believe me when I told him about the situation. This is why I am afraid to talk to the supervisor again.

6. My father is detained and he has an attorney who is helping him, I do not have one. My dad told me that his attorney is helping him to get out of detention and then he can get me out and we are going to go to a church. I am waiting for my father to be released so I can reunite with him I do not know where my father is detained. I do not know where is the church where I am going to go. I haven't been released yet because I am waiting for my father. I talk to my father every 15 days, the last time I talked to him was 20 days ago, I think I am going to talk to him again this week. We talked for 10 mins. I talk to my mom in Guatemala every week, Mondays and Wednesdays. We talk for 10 min. I have a person with me when I talk on the phone and they let me know when the 10 mins are up.

Nobody here has explained to me why I have not been released, I just know for what my dad tells me when I talked to him.

I do not have anybody or any relative who could complete the paperwork for me to leave.

I do not know what are the procedures to be released, I do not understand Spanish very well I have learned Spanish here and nobody has explained anything to me.

I see the social worker every 15 days, nobody tells me anything.

7. I am not allowed to leave by myself, because there are cameras around and if they see me alone, they give me a report. The doors are locked. I haven't been told what happens if I leave the facility. I know that kids here can receive a report, I know of another boy who tried to leave and was given a report and he was sent to another shelter. I feel secure here, they treat me well, but if I want to leave by myself I cannot, I have to ask first but the supervisor told us we cannot wander by ourselves.
8. I do not have a lawyer, my dad does but I do not have one.
9. I do not think my father knew they were transferring me here to this facility before I was transferred.
10. Since being here I have talked to my mother twice a week with my father like 9 times in total because I did not know where my father was. I got to know his whereabouts about 2 months after I got here. I cannot talk to my mother as often as I want because they only give us 20 mins a week to talk on the

phone. If I want to talk 5 min every day I cannot do it, it has to be the 10 mins at a time. I do not think it is enough time, I would like to talk to my mom in Guatemala more often. I talk with her about how I am doing, how are they doing I do not tell her if I need something here (like tooth brush and toothpaste) because I do not want her to worry. She gives me advice to be good and do not get in trouble, I think I need more time to talk to her.

I do not talk to my father often because immigration is listening to the conversation and he is detained.

11. I want to leave the facility I just waiting for a paper for the government, my father is also waiting for his release. I am not sure what paper is but a lady is helping us with that. I do not know the name but she works here.

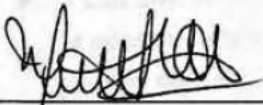
I, [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

10/24/18

Date

Certificate of Translation

I, Alejandra Roa certify that I am fluent in English and Spanish and that I read the above declaration to J [REDACTED] in Spanish. Executed this 24th day of October, 2018 in Homestead, Florida



Maria Alejandra Roa, Esq.
Maria Alejandra Roa, PA
3403 NW 82 Ave. Suite 101F
Doral, Fl. 33122

Exhibit 41

Declaration of

N [REDACTED] R [REDACTED]

I, N [REDACTED] R [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. I left Guatemala with my father [REDACTED] for several reasons, including the fact that my father is in a leadership position in our municipality and was involved in a project that constructed a water tank that the community could use for their washing. Although most people in the community supported the projects, a few people alleged that he had not properly managed the money he collected to build the water tank. He also set up other projects and some community members alleged that he had not properly managed the projects. Those community members were threatening him with violence and said they wanted to harm him. My father and our family was threatened for several reasons: because of my father's leadership position, because of conflicts between our village and a nearby town, and because my father ran a business. My father got death threats and was frequently harassed by adults. In our village, you weren't allowed to go out at night because there were armed patrols, sometimes in masks, who enforced a 10pm curfew. Once, the armed patrol found my uncles out after the curfew, and they beat my uncles up. My father was afraid to go outside at night and couldn't leave the house after nine at night. I was also afraid of those armed patrols, because they would beat people up and they didn't like my father. I was afraid of going out at night. I was also afraid during the day. Once, an angry man came to my house with a machete when I was home alone, doing homework. I had to block the door with heavy items to keep the man from coming inside and hurting me. I was really scared. My father wasn't there and I had to call him to come and rescue me. After that day, I was afraid to stay home by myself and do my homework, even though I'd felt comfortable staying home alone before that. I was also being threatened at my school. I was bullied and threatened because I liked to participate in school, and also because of who my father is. Because of these threats and violence, I became afraid to go outside, and even afraid to study in my own home. I'm afraid that if I return to Guatemala, I will be hurt by those armed patrols or by the other people who have threatened my family.
3. I also did not feel very safe in my family's home because of problems in my family. A family member who stayed with us frequently would hit me with a belt for no reason, and also would often touch me on my private parts. I felt like I couldn't do anything to stop him and I didn't feel that I could tell my parents. This made me feel very bad and unsafe. I didn't feel comfortable telling my parents. I also don't want to return to Guatemala because he is there, and I am afraid of him and don't think my parents can protect me from him.
4. I crossed the border with my father. We climbed a wall and crossed over into the U.S. I think we might have been in Arizona. We were immediately stopped by CBP and transported to a facility. Then I was separated from my father. I wasn't interviewed about asylum claims or asked any questions except for my name, and they did not do a medical exam. I was held in a bunker-like space for about five days, although it was hard to tell how much time had passed because it was difficult to see out outside, and the

inside lights were always on. While I was there, CBP brought in about 16 other children of various ages – from about ages six to 18. Then I was taken out of that facility and told I was going to be taken to a shelter. I asked the officials who were there to let me talk to my father. They brought my father out for only three minutes. My father told me to have faith, and I told him I would. I cried when I was taken away.

5. I was then brought to a building where they gave us food, and then I was taken to another house with other children from the ages of 13-17. I slept in that house for one night. Then the next day I was flown by airplane. They didn't tell me where I was going or that I was being taken to another state. I didn't find out that I would be going to a different state until I talked to one of the YCs here in Homestead and asked where I was.
6. I have been at the Homestead facility for about 70 days, although it is difficult to keep track of how much time has passed and we don't have access to calendars. Although some of the conditions are fine, there have been some problems. There were two boys in my unit who were bullies, and they bullied me and other boys. They pushed me and made fun of me sometimes, and they would hit the other boys in my unit. Those bullies were in my unit for about three weeks. I asked my counselor to move me to another unit, but I didn't get moved. I had to wait until the bullies were transferred out of the facility. I have had four different social workers since I got here. Sometimes the eggs in the breakfast are raw, and one of my friends has gotten sick from eating them. I fractured my arm while playing soccer. The staff put ice on my arm and after an hour they took me to the hospital. I am in a cast and have to wear the cast for three weeks. I was also given pills for the pain, although I wasn't told the name of the pills. I don't think anyone from this facility told my parents that I'd been injured.
7. I have several family members here in the U.S. to whom I could be released. I'd like to be released to my adult cousin. Her name is [REDACTED] she lives in Orlando, Florida, and she has a job. She had told me that I can come live with her when I talk to her on the phone. She is a legal permanent resident, and I know her well because she would visit our family in Guatemala twice a year. I am not sure why I haven't been released to [REDACTED] I've been told that it's because the government is waiting for my birth certificate, but I have been told that my certificate has arrived. Now, my social worker has told me that we are waiting for my aunt's fingerprints to arrive but I don't know why it's taking so long. I have had four different social workers since I've been here, and they all tell me different things about what's happening with my release, which is confusing. The social workers are always confused about my case as well, because they are new. To make an appointment with the social worker, I need to fill out a form, and I am planning on filling out that form so I can get more information. It's hard to understand what's happening when my social worker is changed so often.
8. We are not allowed to leave this facility. I don't think you're allowed to leave and I've never been given information about how you might exit the facility while residing here. There are guards at all time. There are even rules to go to the bathroom. Yesterday, they changed the rules and now we have to put our names down on a paper with the time that we want to go to the bathroom, and if put our names down too many times, we might not get permission to go to the bathroom. I've been told by the YCs that if we try to leave, we will get caught and we might get sent back to our countries. Someone ran away from here recently and I think that if you get caught, you get taken to another facility and perhaps you are punished.

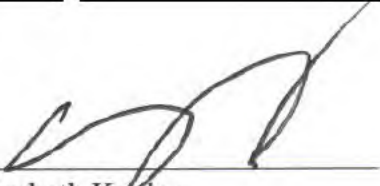
9. I don't have an attorney, although I would like to have one. The people in the legal services trailer interviewed me and explained the legal system. I'm not sure if they are lawyers or not, and I don't think they are representing me in my case. They said it was better to be represented by an attorney, and they gave us a sheet with information about rights and about getting an attorney.
10. I'm not sure if the Office of Refugee Resettlement has asked permission to transfer me. When I was moved from one facility to another the first time, I spoke to my father for three minutes and he didn't know where I was being sent. I have since spoken to my parents by phone, and they didn't know I'd been sent to another place, nor did they know where I was. My parents do know that I want to be released to my cousin, and they support that decision. One of my social workers called my parents and sent my parents a letter that they signed, giving permission for me to be released to my cousin.
11. I am only allowed to speak to my family twice a week for 10 minutes. I'm not allowed to call two different people for five minutes at a time – just one call each time. That's not enough time to talk to my family. If I had more time to talk by phone, I'd want to be able to talk to my mother more and see if she is safe, because she lives in a very dangerous place. It's also been very difficult to get enough time to talk to my cousin [REDACTED] in the U.S. to make plans about leaving this facility.
12. Now, I am waiting to be released to my cousin, but I don't know how much longer that will take.
- I, [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
[REDACTED]
N [REDACTED] R [REDACTED]

01/08/2018
Date

Certificate of Translation

I, Elizabeth Kugler, certify that I am fluent in English and Spanish and that I read the above declaration to
N [REDACTED] in Spanish. Executed this 1 of August in Homestead, Florida.



Elizabeth Kugler

Volunteer Attorney, Employed At Georgetown Law
6711 Westmoreland Ave, Takoma Park, MD 20912

Exhibit 42

Declaration of

M

Y

I, M [REDACTED] R [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Honduras, Santa Barbara my language is Spanish
2. I came to this country with my father Juan [REDACTED] but he was deported a month after we came here. I have been here in this facility for around 5 months since May 27th, 2018. One of the reasons I left Honduras is because I wanted a better future for me and my family. We are 12 siblings plus my mother and my father, I did not have enough food, clothes. I did not have enough food coming here to the United States. I did not work in Honduras, I just went to school there and took care of my little siblings.
3. I was apprehended with my father by immigration. We presented ourselves at the border on or about May 20, 2018. My father and I were separated after 2 days, nobody told me why, I slept in the floor there, we were detained with another adults, the bathroom did not have a door, my dad helped me covering so I can go the bathroom. After 2 days, all the minor children with me were taken to a facility, I do not know the name, they did not let me say goodbye to my father, he did not know where they were taking me, they did not ask for his permission. I stayed in the new facility for 2 days I slept in a bed. The bathroom was not clean, we had to clean it, the bathroom also did not have a door and we took turns so we can go. I was in charge of 2 babies there, one of 1 year old and one of 2 years old. I changed the babies, they woke up at 1 am and I had to feed them but no milk, only juice. I had water at that facility but not hot food. It was really bad because the babies would cry at night missing their parents. The place was really cold, the officers were really mean with the children there.
4. After 2 days, they did not say anything they took us all out with our baggage and they told us we were leaving. We were taken in a bus and then to the airport. They did not tell us where we were going they just said to a better place. I felt afraid and sad and crying because I did not know where my dad was, I felt alone in a place with strangers.
5. I have been at the Homestead facility for about 5 months. At the orientation they told us the rules, if we do not follow they will give us a report and that a report was a very bad thing because it would go in the immigration record for the rest of their lives. They gave us a book of 4 pages. I could not talk to my father but after almost a month later. I was really sad and that is why they helped me here to contact my father.
I wake up at 6 am, then we go to the soccer field, and do exercise and we have to wait until 9 am for breakfast because the little children are first, we did not eat anything from 6 to 9 just an apple. Then we go to school, I like my teacher I have learned a lot. School finishes at 5 pm. After school we watched a movie, and then have dinner.

There are 12 kids in each room, the bathroom is small but everything is clean, the kids in my room are about my age. We have to turn off the lights at 9:30pm. We have clean towels and clean bedding. I can take books if I want, but I have to request permission if I want books from the school.

I can go to church on Saturdays and Sundays. We practiced Christian religion I go on Saturdays. The catholic one goes on Sundays. During the weekends, we exercise, watch a movie, listen to music. We don't celebrate birthdays here.

Kids who do not behave receive a report. The first time they give us a warning, the second time, it is another warning and the third it is a report. I have not received a report yet.

My clothes are given to me. My clothes the ones I brought were thrown away in the airport before coming here. I have like 5 clothes of each, pants, shirts. They check our stuffs almost every day, I don't like that because they leave a mess looking for something they are not going to find.

When I have my period, I ask for medicine for the pain, they do not tell me what kind of medicine. I also take medicine for my allergies, I do not know what type of medicine. If I have to go to the medical center here at the facility, I make a request and then they take me, sometimes not right away. Not like if I am at my home that I took something for the pain right away.

6. I have an aunt who is doing the paperwork for me to leave. Once I got to this facility I had another sponsor, an uncle but they paperwork did not pass, he did not pass something about the fingerprints and I was not allowed to go with him, this is why everything got delayed. Now I have an aunt who is going to be responsible for me she started the paperwork about 2 months ago but it has been long because of the biometrics. My aunt recently told me that they already approved 2 biometrics for her and my cousin. I am just waiting a mail. My case manager is the one informing me about this. I see her every Monday and Wednesday. I saw her today and she told me everything is almost ready to go. My aunt lives in New York.

7. I am not allowed to leave by myself, the doors are locked, they don't let us go because there are many children who has escaped. I have been told that the children that escape are transferred to another facility worse than this. I think the children escape because they want to, not because they treat us bad. Some of the children are desperate. I feel secure here, they treat me well, but if I want to leave by myself I cannot, I have to ask first but the supervisor told us we cannot wander by ourselves somebody has to be with us.

8. I do not have a lawyer.

9. My father did not know they were transferring me here to this facility before I was transferred. They did not ask him for permission.

10. Since being here I have talked to my mother twice a week with my father one time while he was detained because I did not know where my father was, nobody never told me until after a month that I was here. I cannot talk to my mother as often as I want because they only give us 20 mins a week to talk on the phone. If I want to talk 5 min every day I cannot do it, it has to be the 10 mins at a time. I do not think it is enough time, I would like to talk to my mom in Honduras more often. I talk with her about

how I am doing, how are they doing I ask for advice, I tell her how I am doing here. She gives me advice to be good and do not get in trouble, I think I need more time to talk to her.
I do not talk to my father often because now that he is deported to Honduras he is always working.

11. I want to leave the facility I just waiting for the paper from the government to release me, my aunt who lives in New York is my sponsor. My case manager told me today I am almost ready to go.

I, Maylin Rodriguez, swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

M [REDACTED]
M [REDACTED] Y [REDACTED]

10/24/18
Date

Certificate of Translation

I, Alejandra Roa certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] in Spanish. Executed this 24th day of October, 2018 in Homestead, Florida



Maria Alejandra Roa, Esq.
Maria Alejandra Roa, PA
3403 NW 82 Ave. Suite 101F
Doral, Fl. 33122

Exhibit 43

Declaration of
N [REDACTED] C [REDACTED], A NUMBER [REDACTED]

I, N [REDACTED] C [REDACTED] (A number [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. One of many reasons that my family decided to leave Guatemala is that members of the La Mara gang attempted to extort money from my father. He did not have any money to give to them, so they stabbed him six times. La Mara has terrorized the town where I lived in Guatemala. After my father was stabbed, the gang members said that if we did not pay them money, they would kidnap one of my brothers. My father also received messages from the gang members that I would be kidnapped on my way to school. Because of those threats, I had to stop going to school because my family feared for my safety. I also felt very fearful. I stopped leaving my house because I feared for my life.
3. I traveled to the U.S. with my father, stepmother and three-month old sister. My family paid a "cayote" to transport us to the border, and he promised that he would get us into the U.S. safely. We crossed over the border in Texas, although I am not sure exactly where. Shortly after crossing the border, we were apprehended by immigration officials.
4. My father, stepmother, sister and I were taken to an immigration office that seemed similar to a police station. My father and I were separated at that time and my father was led away in handcuffs. I have not seen him since that time. A day or so later, my stepmother and baby sister were removed from the facility. I did not know where they were going or if I would see them again. It is my understanding that my stepmother and sister are now in Iowa although I have not spoken with them.
5. I remained at the original facility for four days. The facility was enclosed and had no windows. I could not tell if it was day or night. We were not permitted to go outside or to take showers. I only know that we were there for four days because we were told that we would be there for that period of time.
6. After four days, I was transported to the facility in Homestead, FL. I arrived in Homestead on June 13, 2018. No one explained to me where I was going, why I was going, or if my family members would be there.
7. After being at the Homestead facility for two months, I was told that I would be sent to Texas to reunite with my father. I remained in Texas for a week, but I was never reunited with my father. No one provided any explanation or reasons that I could not be united with my father. I did not know that I would be returned to Homestead until I was put on a plane to return to the Homestead facility.

8. Currently, I do not know where my father is being held. When I first came to Homestead, I was able to speak to him a few times. However, I have not spoken to him in over three months.

9. My aunt currently lives in Iowa. She is in the U.S. legally. I am told that I may be released to my aunt. It is my understanding that my aunt must submit her fingerprints for analysis before I can be released to her care. My aunt submitted her fingerprints at least three months ago, but I have not yet been released to her. I have been told that my father will need to provide a letter allowing me to be released to my aunt. I do not know what is required to be in the letter or why there have been delays in getting the letter.

10. I arrived at the Homestead facility with some of my own clothes. However, I am not allowed to wear my own clothes, which were taken from me.

11. It is my understanding that I am not permitted to leave the Homestead facility. If I ever attempted to leave the facility, it will be viewed as me trying to escape. If I tried to leave the facility, I would be deported back to Guatemala, where my life is in danger. Other than my trip to Texas described above, I have not left the Homestead facility.

12. We are not able to walk around the facility freely or without being directly supervised. For example, if I need to use the bathroom, I have to ask permission and be accompanied to the bathroom. Our showers are also timed and limited to five minutes.

13. I do attend the evangelical Christian church service each week at the Homestead facility. However, I am not allowed to talk to the pastor.

14. It is my understanding that if I am reported for breaking any of the rules at the facility, my case could be delayed by 15-30 days. One example of an infraction that could delay my case would be passing a note to a boy, or not getting along with someone who shares my room. Likewise, if I report someone else for breaking the rules, their case could be delayed. If a person breaks one of these rules, their recreation time and activities will also be cut. One time, our ability to play basketball was taken away for one month because boys and girls were sending notes to each other. Often, if one person breaks a rule, all of the kids at the facility will be punished in this manner.

15. If I want to speak one-on-one with a counselor, I have to submit a written request.

16. I will be turning 18 next month. I am worried about turning 18, because I am afraid to be deported to Guatemala. I am concerned that if I return to Guatemala, the gang will try to extort me like they did to my father, or even worse.

17. It is my understanding that when I leave the Homestead facility in the future, I will be given a list of attorneys who can help me. However, I have not been given contact information for any attorneys during my time in Homestead. I am not currently represented by an attorney.

18. My property has been searched in my dormitory room at Homestead. This occurred about two months ago. A search will occur when someone in the room is suspected of sneaking food or stealing.

19. Supervisors frequently walk through the dormitory rooms, to make sure that no one is eating. If someone is caught eating food in their dormitory room, that is a violation of the rules which can delay your case.

I, N [REDACTED] C [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

23/10/18
Date

Certificate of Translation

I, DENISSE LAMAS, certify that I am fluent in English and Spanish and that I read the above declaration to N [REDACTED] C [REDACTED] in Spanish. Executed this 23rd of October in Homestead, Florida.


Denisse Lamas
Hispanic Family Counseling
6900 South Orange Blossom Trail
Suite 402
Orlando, FL 32809

Exhibit 44

Declaration of

O [REDACTED] D [REDACTED], A NUMBER [REDACTED]

I, O [REDACTED] D [REDACTED] (A number [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Guatemala.
2. One of many reasons that my family decided to leave Guatemala is that we are poor and we left out of necessity. I wanted to go to school to become a teacher, but I did not think that I could do that in Guatemala.
3. I traveled to the U.S. with my father. I entered the U.S. in El Paso, Texas. When we reached the border, we surrendered ourselves to the immigration officials. My father and I were immediately separated.
4. I was sent to a facility known as the icebox. I did not know where my father was at that time. The facility was very cold and we were not given blankets. I remained at that place for one day.
5. I was transferred to another facility that much like the first one in the sense that it was very cold. During the four hour ride to the second facility, my father was with me and I felt much better about that. However, when we reached the second facility, we were separated again.
6. I stayed at the second facility for one day. I was told that I would be leaving the facility. I asked to talk to my father before I left, so that I could say goodbye. This request was ignored. I was put onto an airplane. I did not know where I was going, why I was going there or if my father would be eventually be there to reunite with me. I arrived at the facility in Homestead, Florida on May 24, 2018.
7. While in Homestead, I told my case worker that I was desperate to find out where my father was and if he was alright. Eventually, my case worker was able to arrange a phone call between me and my father. When I talked to my father, he was upset because he could not communicate with anyone in the facility due to language barriers. My father speaks a dialect that is common where we are from, this language is called Queqchi. My father also told me that he was eating the same food every day. About a month later, I spoke to my father again. He told me that he had found out that he was going to be deported. My father does not know how to read. Nevertheless, he told me that he had signed papers without understanding what they mean, and this sped up his deportation.
8. I am able to speak to my father twice per week, for 10-minute increments. Every time that I speak to my father, a case worker for the government is present and listening to what I say.

9. My case was not started until 90 days after I arrived here in Homestead. The reason for this was that it was believed that I would be reunited with my father, and as such it was not necessary to start working on my case. Once my father had been deported back to Guatemala, the immigration officials realized that I would not be reunited with him.

10. It is my understanding that my cousin, J [REDACTED] is willing to care for me and I might be released to his care. My cousin lives in Virginia. I am not sure if my cousin is here in the U.S. legally, but my case worker told me that is not relevant. So long as we can establish that my cousin is family and he is willing to care for me, I will be released from Homestead. It is my understanding that my cousin sent in his fingerprints to the government in August 2018, which is a requirement for me to be released to him. I do not understand what the delay is, why I have not been released to my cousin or if I will be released to him in the future. I worry about this a lot. No one at Homestead has explained this process to me. I am worried about what will happen if my cousin is not approved to take care of me, because I don't know of any other relatives that I have in the U.S. who would be willing to help me.

11. I arrived at the Homestead facility with some of my own clothes and personal items. Those were taken from me, but I hope that I will get the items back when I leave Homestead.

12. It is my understanding that I am not free to leave the Homestead facility. I think that if I tried to go outside of the facility's walls, it would be seen as me trying to escape and I would be in trouble. I know of some other children at Homestead who have tried to leave the facility. They were caught and sent to a jail.

13. We are not able to walk around the facility freely or without being directly supervised. My actions, and the actions of the other children at the facility, are watched and monitored at all times.

14. Our showers at Homestead are also timed and limited to five minutes. We are reprimanded if our showers last for more than five minutes.

15. I do attend the evangelical Christian church service each week at the Homestead facility. However, I am not allowed to talk to the pastor.

16. It is my understanding that if I am reported for breaking any of the rules at the facility, I will get a "report." If I get a report, my case will be delayed. I know other children at the facility whose cases were delayed because they got a report. One of the boys that stay in my dormitory room currently has two reports. He was told that he was about to be released from the facility and he signed papers so that he could leave. He was very happy to be leaving Homestead, but he was then told that because he had gotten two "reports," he would have to stay at the facility for 15 days longer.

17. My property has been searched in my dormitory room at Homestead. The room that I am staying in was searched as recently as last week. I had three pairs of pants in my room. Two of them were given to me by a friend, when he left the Homestead facility. Apparently, I am only allowed to have one pair of pants. The other two pairs of pants were taken from me. I


also had pencil and paper in my room because I like to draw. The pencil and paper were also taken from me.

I, O [REDACTED] D [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
7/02/18
Date

Certificate of Translation

I, DENISSE LAMAS, certify that I am fluent in English and Spanish and that I read the above declaration to O [REDACTED] D [REDACTED] in Spanish. Executed this 24th of October in Homestead, Florida.



Denisse Lamas
Hispanic Family Counseling
6900 South Orange Blossom Trail
Suite 402
Orlando, FL 32809

Exhibit 45

Declaration of
Y [REDACTED] A [REDACTED] A NUMBER [REDACTED]

I, Y [REDACTED] A [REDACTED] (A number [REDACTED]), declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] am from San Francisco La Paz, Honduras.
2. I crossed a river into in Texas US on 1 June 2018 with my father [REDACTED] When we encountered immigration authorities and we were taken to "la Hielera" the ice box. I was immediately separated from my dad. My dad was taken to another place and I have not seen my father since that day.
3. In the facility in Texas we slept on the floor and we were only given a silver thermal blanket for one night. I was sent to "La Perrera" the juvenile detention center known as the dog kennel, for three nights and there were many other kids. The girls were separated from the boys. We also had to sleep on the floor for three days. We were given tacos and beans an apple and some water three times a day and that was all we had to eat for three days. I became ill from the food at "la Perrera" and I asked for medication but no one helped.
4. My dad was returned to Honduras the same week we arrived. I only learned that my father was back in Honduras the week after I was transferred to Homestead.
5. I have been here for close to 6 months. My parents did not give permission for me to be transferred here.
6. Since I got here I have communicated with my parents. My counselor [REDACTED] allows me two calls a week for ten minute speak with my parents. It is a large room and I have no privacy to speak with my parents. I have received no letters and have no access to email to write to my parents.
7. I feel very good that I am studying here because Honduras was very dangerous. I was only able to go to school up until 6th grade.
8. My sister [REDACTED] in Miami would like me to come and live with her. My sister has filled out the paperwork and they are waiting for the fingerprint check to come back for my sister and brother-in-law. However, they already have my sister's fingerprints on file and we are waiting on her husband, my brother-in law so I am not sure why it is taking so long. I can have visits but my sister can't come because she has three kids.
9. My case manager [REDACTED] is not here anymore but some lawyers came to the facility and explained the process for reunification and my rights. I was given a number to call when I leave here but I can't call an attorney from here.
10. My parents just signed a power of attorney to authorize me to stay here with my sister.
11. It is very cold here, especially in the classrooms.
12. They explained the rules but I never got a handbook and they didn't give me anything in writing to explain how things work here. They told me that if I don't follow the rules they will transfer me to another facility. If you do not behave here, you may lose your rights to stay here If you do something wrong you get a report and if I go before the immigration judge I have to explain why the report was made and that may impact my ability to stay. I have heard from my counseling that if you misbehave and get a report that they can keep you here longer.

13. If the girls try to talk with the boys or pass notes we get a report. The counselor told me that there are kids here who hit themselves with sticks and cut themselves and the counselors made a report on them and their case got delayed.
14. They wake us up at 6 am. We then get an apple and then they take us to exercise. Then all the girls exercise like running or Zumba for ½ an hour and then we go to school. We wait to eat breakfast at 10.
15. In school, we have classes. There are 36 girls in my class and we have had 3 teachers in 5 months. We have ESOL class and Math.
16. At 2pm we go to eat lunch and we have 15 minutes for lunch. At 5pm we have some free time.
17. There are 12 girls in my room and only one bathroom and one shower. We only have 5 minutes to shower. We are required to stay on our beds while other girls use the shower. If we need to use the toilet we can't. If we get off the bed they can file a report against us.
18. When I arrived here they took my clothes and gave me new clothes. I was given 5 shirts, shorts, underwear and 5 pants. We keep our things like personal hygiene materials in a trunk under my bed, it is not locked and once a week they search it.
19. I go to see my counselor two times a week because I am sad. They help me. We go to church on Saturdays here in the facility.

I, Y [REDACTED] A [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
Y [REDACTED] A [REDACTED]

34/10/2018
Date

Certificate of Translation

I, MIGUEL A. PEREZ VARGAS certify that I am fluent in English and Spanish and that I read the above declaration to Y [REDACTED] A [REDACTED] in Spanish. Executed this 24 of OCTOBER in HOMESTEAD, FLORIDA.



MIGUEL A. PEREZ VARGAS
Multicultural Education, Training & Advocacy, Inc.
perezvargasmiguel@gmail.com

Exhibit 46

DECLARATION OF M [REDACTED] A [REDACTED]
[REDACTED]

I, M [REDACTED] A [REDACTED] declare that the following is true and correct to the best of my knowledge and belief:

1. My name is Miguel A [REDACTED] I believe I was born in [REDACTED] in Huehuetenango, Guatemala. I am not exactly sure of my birthdate, but the month and year are what my father has told me. I am 13 years old. I speak Spanish and Akateko. When I was in Huehuetenango, I lived with my grandparents. My grandfather doesn't speak Spanish at all, so Akateko is the language I spoke at home.
2. I have spent about three months in the immigration detention center for migrant children in Homestead, Florida, where I am held now. I am hoping to be released to my father, who lives in Alabama. I am not sure exactly what else needs to happen before I can live with my father, but a social worker said that I might be transferred in 20 days or less.
3. When I crossed the border into the United States, I spent one day in a place where a lot of kids were held in big cages. Before I went into one of the cages, the immigration agents took my backpack and my birth certificate. I'm not sure if those things made it with me to Florida. I haven't seen them since I've been here, and nobody has told me where these belongings are.
4. I go to school here. We learn to write and draw, and we have other activities. I have a problem seeing letters when they are small, so I can only read things in big print.
5. Everybody else in my class is writing. I'm the only one who can't write, because I can't see the letters well enough. I want to learn to write but I can't because I can't see.
6. The teachers have given me some things to read with big print, but I don't think they've changed anything else about the way they teach to make sure I can read and write the way the other kids can. Most of the time I just draw pictures.

7. Some of the other activities are things like soccer. I don't want to play those kinds of activities because I don't see well.

8. The rules here include things like not writing on the walls, don't draw on your clothes, not touching the computer, walking in line, not disrespecting the girls, not touching anybody else. Kids who break a rule get a report. If you get a report, you stay here 15 days longer. This is what the staff tell us. I have heard staff say this many times.

I make this declaration under penalty of perjury under the laws of the United States. This declaration was provided to me in English and read to me in Spanish, a language which I understand.


Date: 3 26 79

Certificate of Translation

I, MICHAEL BOCHENEK, certify that I am fluent in English and Spanish and that I read the above
declaration to M [REDACTED] A [REDACTED] in Spanish. Executed this 26th day of March, 2019, in Homestead, Florida.



MICHAEL BOCHENEK
Human Rights Watch
350 Fifth Avenue
24th Floor
New York, NY 10118

Exhibit 47

Declaration of A [REDACTED] H [REDACTED]

I, A [REDACTED] H [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from Comayagua, Honduras.
2. The main reason I left Honduras is because my life was threatened. I witnessed a murder in January. I was walking down a road to my house and I saw two masked men shoot and kill another man who was passing on a motorcycle. Later two men in masks found me and put a gun to my head. They said they would kill me if I talked to the police.
3. I've already been shot once. When I was 14 some men tried to kill my father. They ended up hitting me in the lower leg. I thought I had lost all chance of walking again. I was lucky because a Honduran organization paid for four operations to reconnect the nerves and tendons. Sometimes my leg is numb, but I can walk with a brace.
4. I crossed the border near Piedras Negras, Mexico. They took me to a place where they had children, women and people who were asking not to be deported all held in different cells. It was chilly there and they gave us aluminum blankets and thick mattresses. In the morning, I was very cold. They gave us a little bit of soup and some burritos. It wasn't enough. We were all hungry. I spent two days there.
5. I've been here in Homestead for 10 days. I want to go live with a maternal uncle in Houston, Texas. I know I have to wait for the process but it's hard. I'm worried because I don't have any photos with him. My social worker said I had to have photos with him to prove we know each other. I've only seen my social worker once. I've seen my counselor twice.
6. Sometimes things are tense here with the other kids because no one wants to be here and some can't stand it anymore. Some kids have words with each other and try to start problems.
7. I'm worried because I'm going to be 18 in May. They said if I get out I will go to court to fight my case. I'm terrified of going back to Honduras. I just want to get out of here.

I, A [REDACTED] H [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



03/26/2019
March 26, 2019

Certificate of Translation

I, Teresa Lee, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED] H [REDACTED] in Spanish. Executed this 26 of March in Homestead, Florida.

A handwritten signature in cursive script, appearing to read 'Teresa Lee', written over a horizontal line.

Teresa Lee
Kids in Need of Defense (KIND)
2815 Hartland Rd., Suite 110
Falls Church, VA 22043

Exhibit 48

DECLARATION OF J [REDACTED] N [REDACTED]
[REDACTED]

I, J [REDACTED] N [REDACTED] declare that the following is true and correct to the best of my knowledge and belief:

1. My name is J [REDACTED] N [REDACTED] I was born on [REDACTED] in Managua, Nicaragua. I am 16 years old.
2. I lived with my grandmother in Nicaragua. My mother lives in New York and is my sponsor.
5. I left my country about two months ago and travelled here with a cousin who is also 16 years old. I am not sure where he is.
6. I travelled through Mexico and in Ciudad Juarez, Mexican officials asked for \$300 so I could cross over to the United States. I paid them and crossed into El Paso where I was picked up by immigration agents. They put us into small vans and we were driven to a "perrera." I'm not sure where it was but it may have been Houston.
7. It was horrible in the perrera. They call it this because they treated us like animals. It was very, very cold. I only had a piece of aluminium to sleep on the floor. We were fed three times a day – oatmeal and juice for breakfast, soup and juice for lunch, and burrito and jugo for dinner. But this was not enough food and I was very hungry.
8. There were about 400 kids in the perrera. I was in the perrera for 8 days and I got sick because it was so cold. I have asthma and was given pills and an inhaler. The officials in charge of the perrera smoked and the odor bothered me because I have asthma. I spoke to a 14 year old boy from Honduras who had been there for almost 2 months because he had tried to escape.
9. After being in the perrera, I was brought here, to the detention center in Homestead. I have been here for 38 days. No one has explained to me why I have been here so long.

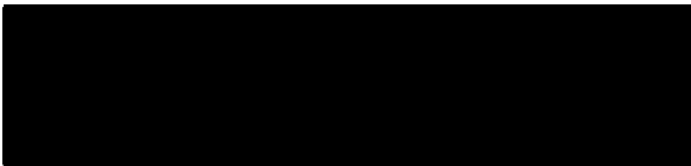
10. There are a lot of rules here. If you break a rule, you get a report. If you get a report, the staff says it will delay your case.

11. I speak to my mother twice a week by phone for 10 minutes each. 20 minutes per week is not enough time and I would like more time to speak with her.



12. I have not spoken to my social worker for 2 weeks because she has been on vacation. I am supposed to speak with her tomorrow. I also have not spoken to my counselor in 10 days. I submitted a form to speak to my counselor but have not received a response.

13. I do not know how to make a complaint. No one explained this to me. I would like to speak to my social worker and my counselor more often but I am not sure how.

I make this declaration under penalty of perjury under the laws of the United States. This declaration was provided to me in English and read to me in Spanish, a language in which I am fluent.

Date:  3/27/19

Certificate of Translation

I, NATASHA QUIROGA, certify that I am fluent in English and Spanish and that I read the above declaration to J  N  in Spanish. Executed this 27 of March, 2019, in Homestead, Florida.


NATASHA QUIROGA

Lawyers' Committee for Civil Rights Under Law
1500 K St NW Suite 900
Washington, DC 20005

Exhibit 49

DECLARATION OF H [REDACTED] S [REDACTED]
[REDACTED]

I, H [REDACTED] S [REDACTED] declare that the following is true and correct to the best of my knowledge and belief:

1. My name is H [REDACTED] S [REDACTED]. I was born on [REDACTED] in Jutiapa, Guatemala. I am 16 years old. I am currently held in the immigration detention center for migrant children in Homestead, Florida. My 14-year-old brother, J [REDACTED] S [REDACTED] is also held here in a separate dormitory.

2. I left my home in Guatemala with my 14-year-old brother J [REDACTED] S [REDACTED] about three weeks ago. The journey to the US border took us about seven days. We crossed the border on a Saturday—I am not sure of the date—between Mexicali and California. After we crossed the wall, we walked for about 20 minutes until immigration agents saw us and took us into custody.

3. The immigration agents took us to a cell. We spent about two days there. It was a big cell with a lot of people, all minors. The air conditioning was set very high, so it was really cold. None of us had mats, so we just slept on the floor. We had blankets that were made of something like aluminium.

4. All of us were allowed to shower once. After our showers, we wore the same clothes we arrived in. We weren't allowed to wear more than one layer, even though the cell was very cold, so we had to decide whether to wear a sweater or a shirt; we couldn't wear both. The immigration agents who told us this rule didn't explain why we had to do this.

5. Some of the agents treated us well, but others treated us badly. There were some that would check if we had enough to eat and would give us more food if we asked. But others only spoke to us in English even though they knew we couldn't understand them. They used words we could tell were insulting. Some of these words are words we recognized, things like, "Fuck you." Other times they said things we

[REDACTED]

didn't understand, but we could tell from their tone that they were not being nice. They spoke to us abruptly and rudely.

6. All of us in the cell were 17 and under. I think the youngest was 12 or 13. All of us were boys. The girls and women were held separately.

7. After 2 days, the immigration agents took my brother and me to San Diego. After about 30 minutes there, they put us on a plane. We changed planes once before we arrived here in Homestead.

8. When we arrived here, we were registered and went to the medical area. I received 9 vaccinations, and the doctors also took a blood test. I'm not sure why they took the blood test, because they didn't tell me why. They didn't give me the results. They never called me back to give me the results or explain what they found. It would be good if I could know the results of my own blood test so that I understood my medical situation.

9. My brother and I are in separate dormitories. There are 12 kids in all in my dormitory, and the same in my brother's. Because he's in another dormitory, we can only see each other when we make phone calls to our relatives or sometimes during lunch. We are allowed to eat lunch together two or three times a week. I don't know why we are separated, because I think some of the other kids in my room are about his age. One is about 13, I think. For me, it would be better if we were together, or at least if we could spend more time together.

10. We are allowed to call our relatives twice a week, on Mondays and Wednesdays. We get ten minutes for each call. If we want to call two people on the same day, we get five minutes per call. If we want to call three people that day, they divide the 10 minutes accordingly. We're allowed to make international calls as well as domestic calls. Ten minutes really isn't enough. Our relatives are far away, and we want to be able to have time to speak to them. I feel bad that they are so far away, and I want to be able to speak to them. I also want to be able to speak longer to my mother, who lives in Tennessee, to be able

to keep our relationship, because I have not lived with her since I was five years old, so it is really important to me to be able to talk with her for as much time as possible. If I also have to call somebody else that day to get updates or advice, I only have five minutes to speak with her, and that is very hard.

11. The YCs, the name for the staff members who supervise us, tell us what the rules are. The rules are things like not touching other people, whether another kid or a YC; don't go anywhere unless accompanied by a YC; don't wear earrings or have visible tattoos; don't fight; no more than five minutes in the shower; don't disrespect anybody. If we break a rule, we get a report. Getting a report means we will spend more time here. The YCs tell us this themselves, and I have heard them say this directly to groups of us many times. They say a report will delay your case for some amount of time. That's what the YCs tell us: for instance, if a group is playing around and a YC thinks they might misbehave, the YC will remind us that a consequence of misbehaving is that we will spend more time locked up here.

12. My mother lives in Tennessee and is willing to care for me. I understand that she has an appointment for her fingerprints next week, on Monday. Then she will sign something, and that's when I will be able to live with her—unless I have a report, which means I would spend more time here. Luckily I don't have a report. I'm not sure how long the process will take, but I hear that it might be another two weeks or maybe a month before I can live with her.

13. Once I am living with my mother, I want to study and eventually to work, but first I want to focus on completing my studies.

14. I hope that this information is useful for the judge.



I make this declaration under penalty of perjury under the laws of the United States. This declaration
was provided to me in English and read to me in Spanish, a language in which I am fluent.



Date: 03-26-2019

Certificate of Translation

I, MICHAEL BOCHENEK, certify that I am fluent in English and Spanish and that I read the above
declaration to H[REDACTED] S[REDACTED] in Spanish. Executed this 26 of March, 2019, in Homestead,
Florida.

A handwritten signature in black ink that reads "Michael Bochenek". The signature is written in a cursive, flowing style.

MICHAEL BOCHENEK
Human Rights Watch
350 Fifth Avenue
34th Floor
New York, NY 10118

Exhibit 50



Declaration of

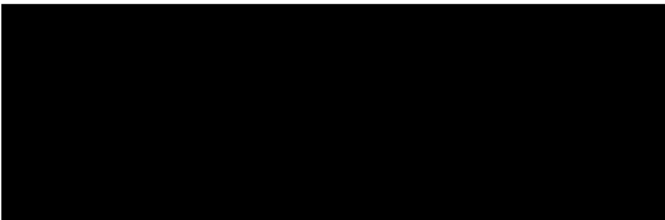
E [REDACTED] IS [REDACTED] G [REDACTED]

I, E [REDACTED] I [REDACTED] G [REDACTED] (A number [REDACTED]) declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am sixteen years old. I am from El Salvador.
2. I left El Salvador on or about February 8, 2019. I did not travel with any of my family members.
3. I crossed the border into the United States near Reynosa on or about February 19, 2019. I walked for about an hour, trying to find immigration officers to help me. The officers took me to McAllen, Texas, where I was detained for four days in a detention center that I call *la hielera*.
4. Everything at the *hielera* was terrible. We did not receive enough food, and the food that we did receive was awful. For lunch, we got small tortillas with a very little of something wrapped inside and just a little juice. For dinner, we got sandwiches with ham and lettuce -- but the sandwiches were still frozen, and I could not eat them. I felt hungry every day that I was at the *hielera*. I also felt very cold at the *hielera*. The air conditioning was on all the time, and I did not have enough clothing. I was given a thin aluminum sheet, but this was not enough to keep me warm. I had to share a room with about 100 children. We were so crowded together. There were no beds for us. There were some mats on the floor, but not enough for each child. I never got a chance to sleep on a mat. There wasn't even enough floor space for me to lie down and stretch out on the floor. I could hardly sleep in the *hielera*. The lights were on all the time, even at night. I did not know when it was day or night because the *hielera* was entirely enclosed. There were no windows. The bathrooms were dirty. I only could shower once in four days.
5. After four days at the *hielera*, I was brought here to the detention center in Homestead, Florida. I have been here longer than one month. I would like to leave here and live in Los Angeles, California with my uncle, Jose Dimas Coreas. He has been in the United States for about six years.
6. I cannot leave here because my case is not complete. For the first fifteen days after I arrived here, I was not able to talk with a social worker who could work on my release plan. I was able to meet with a social worker for the first time about eight days ago.
7. My social worker said that before I am released, my uncle must submit fingerprints. My uncle and I wait eagerly every day for his fingerprinting appointment. But he has not received an appointment over the past eight days. To me, this feels like a long delay. I have asked my social worker why it is taking so long for a fingerprinting appointment. The social worker told me that it might be weeks longer of delays.

8. I do not know how to speed up the process that will let me get out of here. My uncle also does not know. I do not know anything about the *Flores* settlement agreement. No one here has given me information about my release options under *Flores*.
9. I feel sad when I think about how long children are here. I am in Dorm B 1282. There are about twelve of us there. Some of the adolescents there have been waiting months to be released.
10. There are many rules here. You cannot hug a friend or touch anyone. You cannot try to leave. If you commit any errors, a supervisor will write a report about you. If you get a report, you have to stay here for fifteen days longer. During that time, you will not be given any information about your case.
11. We are always with a YC (Youth Counselor) here. The YCs watch us all the time. If you try to go anywhere independently, you will get a punishment. We always need to be with a group or with a YC.
12. I follow all the rules here because I do not want to commit any errors and I do not want any reports about me. I do not want to be detained here any longer.
13. I do not have an immigration lawyer. I feel alone here. I do not know how to apply for asylum.

I,   swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



16/03/2019
Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to E [REDACTED] G [REDACTED] in Spanish. Executed this 26th day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

Exhibit 51

Declaration of

G [REDACTED] N [REDACTED] H [REDACTED]

I, G [REDACTED] N [REDACTED] H [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I am 17 years old today. My date of birth is [REDACTED] and I am from Guatemala.
2. I left Guatemala on January 23, 2019. I travelled alone and crossed the border in Arizona on January 31, 2019. Once I crossed the border, I gave myself up to the US Border Patrol.
3. I was processed and taken to La Perrera, where I stayed for 2 days. This facility was a large building with about 5 large enclosed rooms inside. The rooms had one horizontal window which faced the Border Patrol Officers and their work stations. I was placed in one of these rooms with about 40 other kids ages 8 to 16 years old. The room had no furniture except for built-in benches along the walls. There were 3 bathrooms inside the room which we all had to share. There was no room for kids to sleep. The room was cold and we had to sleep on a paper-thin cover, on the floor. We were given no blankets and were allowed to keep only a t-shirt and pants before our belongings were taken away. During the day, kids would take turns sitting on the bench and sleeping on the floor. We were cold and cramped, and many slept on top of each other.
4. At La Perrera, we were given cold hamburgers for breakfast in the morning, juice and cookies for lunch at noon, and lukewarm or cold ramen soup for dinner at midnight. We knew it was midnight because we could see the time on the officers' computers through the window. We would be asleep, and the guards would have to wake us up to eat. It was hard to be placed in this room with so many other kids, and not knowing where we were or what was going to happen to us. Most of the guards did not speak Spanish, and some English-speaking guards would speak loudly and be disrespectful to us.
5. After two days at La Perrera, 12 of us were told we were leaving. A group of 12 of us were accompanied by a male and a female, and went to Miami by airplane.
6. We arrived at Homestead on February 3, 2019. I have been here for 53 days. Our group of 14-16 year-olds was taken to the dining tent along with other groups of boys who had just arrived. Our photo id's were taken, and we were explained how the place worked. We were also told what the rules were.
7. One week later, we were given a more complete orientation, where the rules were stated and explained again. Among other things, we were told that there was to be: no touching of anyone, no running, no bullying, no pulling of shower curtains, no whistling at girls, no blowing of kisses to girls, no making connections with girls. We were always to be respectful of the staff and of each other. If any rule was broken, we would have a 'report' written up, which would negatively affect our cases and delay our release from the facility by 10-15 days. This was told to the entire group of new people like myself, during this orientation. Since then, I have heard of these consequences many times.

8. Sponsor – my uncle Johnny G [REDACTED] was to be my sponsor. He is my mother's cousin and lives in Miami. My case worker worked with him to submit paperwork and to get fingerprinted. I would talk to him on the phone and he would tell me that everything was going well, but one week ago, my case worker told me that he had been rejected a my sponsor, since he was not a 'blood relative,' which I thought he was. I was devastated by the news and had a very difficult week. I felt anxious and sad, and hopeless. Fortunately, today, I was told that my mother had located her brother Jaime Emanuel Hernandez Perez, who is applying to be my sponsor. We believe that he will be approved, but the process is starting all over again. I have been at Homestead for 53 days.
9. I do not have a lawyer.
10. I never got a paper about the Flores Settlement.

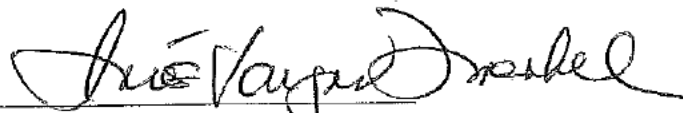
I, G [REDACTED] N [REDACTED] H [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in English, and was read back to me in Spanish, a language in which I am fluent.

[REDACTED] 2,019

Date

Certificate of Translation

I, INES VARGAS FRAENKEL, certify that I am fluent in English and Spanish and that I read the above declaration to G [REDACTED] N [REDACTED] H [REDACTED] in Spanish. Executed this [REDACTED] day of March, 2019, in Homestead, Florida.



INES VARGAS FRAENKEL

163 Duncan Way
Oakland, CA 94611

Exhibit 52

DECLARATION OF D. [REDACTED] A. [REDACTED]
[REDACTED]

I, D. [REDACTED] A. [REDACTED] declare that the following is true and correct to the best of my knowledge and belief:

1. My name is D. [REDACTED] A. [REDACTED] I was born on [REDACTED] in San Miguel, El Salvador. I am 14 years old. I speak Spanish.

2. I have been detained for 164 days. I was detained when I was crossing a bridge in Texas into the United States on October 14, 2018. They put me in a cage with three other kids. We were locked in a place we called the *perrera*, because it has cages like a dog kennel. This place is in Texas.

3. Before I went into one of the cages, the immigration agents took all my things and my birth certificate. I don't know if my things are here with me in Florida.

4. My mother, my aunts and my cousins are here in the United States. My mother is in Maryland. She would like to take me. I want to be with my mother and I want them to let me go. The government staff called her last Monday. They have visited her home. It's been more than a month that I've been here. It's taking forever. I don't know why it's taking so long. My case worker has told me she is working on it but she hasn't really told me anything about what's going on. They tell me to have patience. I don't feel good when they keep telling me to be patient. I want to be with my family.

5. We used to get up at 8 AM here, but now we get up at 5 AM. We brush teeth, make our beds and then go to school. We don't have breakfast until after we go to school.

6. At school there are 37 kids in my class, with one teacher. We don't have any lessons on the computer.

7. The food here is not very tasty. The breakfast is scrambled eggs, sometimes tortilla and sausage or other meat, and milk. It is very bland and sometimes I don't eat it. For lunch we have potatoes, hot dogs, pizza, and for dinner we have rice and chicken. I don't like it. The chicken is not well cooked. Here's it's chicken almost every day.

8. On Saturdays and Sundays they used to put on music and movies, but not anymore. We don't have any books or games on the weekends. We sit around and draw.

10. It's hard to explain how this is affecting me. Some days I feel good, and sometimes I feel bad. Ten minutes twice a week is all the time I get to talk with my mother. If you talk to two people you get five minutes each. If you talk with three people, you get four minutes each. The time is not long enough and there are not enough calls. I don't feel good, and when I don't feel good, I want to talk with my mom. If I can talk with her, I feel more secure.

I make this declaration under penalty of perjury under the laws of the United States. This declaration was provided to me in English and read to me in Spanish, a language in which I am fluent.

26 Mar 20
Date: 26/03/2019

Certificate of Translation

I, BETH LYON, certify that I am fluent in English and Spanish and that I read the above declaration to
D [REDACTED] A [REDACTED] in Spanish. Executed this 26 of March, 2019, in Homestead, Florida.

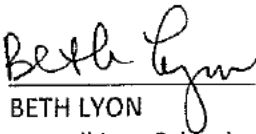

BETH LYON
Cornell Law School
156 Hughes Hall
Ithaca, NY 14853

Exhibit 53

**Declaration of S[REDACTED] N[REDACTED]
A NUMBER [REDACTED]**

I, S[REDACTED] N[REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I was born on [REDACTED] I am from Guatemala. I am 16 years old.
2. When I was five my parents separated and I grew up with my grandparents.
3. I left Guatemala in early February and travelled through Mexico. I crossed a river to come to the United States. It was in Texas. I walked for about 15 minutes and found immigration.
4. Immigration brought me to a room called a *hielera* where I stayed for about 30 hours. There they gave me a disposable blanket and there was a cement bench to sit and sleep on. Then I was brought to a *perrera* – that is like a cage inside of a building. I spent 5 nights in the *perrera*. They gave me a mat to sleep on and an aluminum blanket. There were about 15 boys in the same cage with me. It is difficult to sleep there because of the cold and because the lights are on 24 hours a day. They gave us a burrito, cookies and apple for breakfast and the same thing for dinner. For lunch they gave us a ham sandwich.
5. Then they brought me here to Homestead in a place. I have been here now for 38 days.
6. When I arrived they gave me a check up. They asked if I had any diseases and if I had any tattoos. I don't know why they ask about tattoos. About three days later they took blood. They told me it was to see if we have any diseases in our blood but they never gave me the results of the test.
7. There are many rules. It is hard to remember all of the rules. You shouldn't fight. You have to obey the youth counselors. You have to respect the girls and should not look at them when they pass by. You cannot touch other people. If you have to go to the bathroom, someone has look after you and go with you to the bathroom.
8. If you break a rule at first they tell you not to do it. Then they can make a report against you. The social worker said that a report can delay your case to leave here. And if you act badly, it could affect your case.

9. My uncle who is going to receive me lives in Arkansas. He had an appointment on Monday to do his prints so that I can go live with him. But he had to cancel the appointment because he lives far away the appointment. I want to be with my uncle because I would like to study.

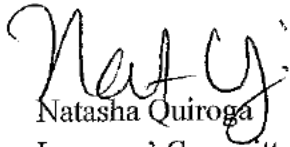
10. I arrived with six other kids. All of them have already left. I want to leave too. I feel bad that I am still here and bored. I don't understand why my case to leave is delayed.

I, S [REDACTED] N [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a language in which I am fluent.

3 | 28 | 19
Date

Certificate of Translation

I, Natasha Quiroga, certify that I am fluent in English and Spanish and that I read the above declaration to S [REDACTED] N [REDACTED] in Spanish. Executed this 28 of March, 2019 in Homestead, Florida.



Natasha Quiroga
Lawyers' Committee for Civil Rights Under Law
1500 K St NW Suite 900
Washington, DC 20005

Exhibit 54

Declaration of

D [REDACTED] J [REDACTED]

I, D [REDACTED] J [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am sixteen years old. I am from Honduras. I am an Evangelical Christian.
2. I traveled to the United States alone, without any of my family members. I crossed the border into Texas on March 4, 2019. Just after I crossed the river, border patrol agents took me into custody.
3. For four days, I was detained in a detention center that we called a *perrera* (dog kennel) in Texas. The *perrera* was horrible. The guards insulted us using the worst and ugliest words imaginable. They insulted our mothers too. They did not treat us with any respect. Because of my religious convictions, I cannot repeat the insults and curses that the guards used when speaking with us. When kids in the *perrera* talked with one other, the guards got mad. They told us to be quiet. The food was terrible at the *perrera*, and it was insufficient for me. I was hungry every day, and my hunger made it hard for me to sleep. It was also hard for me to sleep because there were no beds. We could try to sleep on the floor. We were only given a sheet of aluminum. That sheet was not enough to keep me warm, as it was extremely cold in the *perrera*. When the guards needed to call one child, they would do so in loud voices that would wake up all the children. At the *perrera*, we were inside all the time, with the lights on all the time. I did not know when it was day or night. I felt so bad at the *perrera*.
4. After being at the *perrera*, I was brought to the detention center in Homestead, Florida. I arrived here about seventeen days ago on or about March 9, 2019.
5. I wish I could leave Homestead and live with my aunt M [REDACTED] A [REDACTED]. She lives in Maryland and has been in the United States for many years. Her phone number is 410-501-7013.
6. I do not know when I can leave this place. I want to get out of here as soon as possible. I have spoken with a social worker two times about how I can leave. I understand that before I am released, my aunt's fingerprints need to be taken and the government must verify that she is actually my aunt. I do not know when my aunt will receive the fingerprinting appointment. My aunt also does not know this. I do not know anything about the *Flores* settlement agreement. No one here has given me information about my release options under *Flores*.

7. I am allowed to call my family two times each week, with a time limit of ten minutes per call. This is not sufficient time for me to talk with my family. I wish I had more time to talk with my family. They are a source of great emotional support for me. They share their affection for me, give me advice, and update me on how my loved ones are doing. On the days when I cannot call my family, I worry about them and feel anxious and depressed. I worry about my grandmother's health and how she and others are feeling.
8. I often feel sad and depressed here. I am accustomed to getting hugs from my family and to having my family say good night to me. I don't have anyone to do that for me here. I cry in my room some nights. I try to distract myself by reading the Bible, listening to music, or talking with other kids. But it is most hard and sad to think about my family because I miss them a lot.
9. Other children here are also very sad. They cry a lot. Some children do not have anyone to receive them in the United States. They do not know whether they can ever leave from here. These children are suffering the most. Much of the time they are crying and crying. They do not have energy, they do not have hope, they do not want to talk with anyone, and they are not motivated to play. One of my friends has no one to receive him in the United States. When he is in his room, he just cries and cries.
10. All the kids here must behave well and comply with all the rules. There are many rules. You must wear your clothing at all times. You must be friendly. You can only shower for five minutes, which does not feel like enough time to properly clean my body. You cannot give anyone a hug. You cannot leave. You need to be with a YC (Youth Counselor) who watches you all the time.
11. I have only been here for about seventeen days, but it seems like the rules and schedules frequently change. It is difficult to know what the rules are and what we need to follow.
12. If you misbehave or break a rule, you will get a report. If you get a report, you will be detained here for one extra month. There are some kids here who get into fights with each other and insult each other. They get reports and have to stay here for more time. If a child fights a lot, then he gets moved to a different shelter.
13. If anyone tries to escape, he will go to a detention center with more security. At that location, there are four guards watching each child at all times so he does not escape. After six months, the child will be deported.

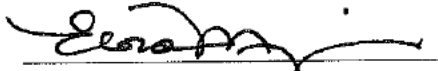
14. The YCs tell us do not try to escape because you will be found and you will lose the opportunity to be here. The YCs change often, and it is hard to get to know the YCs very well. I do not feel comfortable with the YCs because I feel like I don't know them and I don't trust them.
15. In my dorm, we are woken up every day at 5:45 a.m. Then by 6:15 a.m., we must go to school, but we just sit there and do nothing for two hours. At 8 a.m., we are permitted to eat breakfast, and we start our learning at 8:45 a.m. I do not understand why they wake us up at 5:45 a.m. every day.
16. The same food is served at every meal here. Children sometimes do not feel like eating the same food over and over again. We complain about the food. At times I feel like vomiting because I see the same food again. At times I go hungry because I do not like the food.
17. As an Evangelical, I cannot play soccer or participate in other sports or activities that children here often do. I wish there were more opportunities for practicing music and learning from music teachers.
18. I do not have an immigration lawyer. I do not know how to apply for asylum. No one has told me about my *Flores* rights.

I, D [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

26/03/2019
Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to D. [REDACTED] J. [REDACTED] in Spanish. Executed this 26th day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

Exhibit 55

DECLARATION OF H [REDACTED] M [REDACTED]

I, H [REDACTED] M [REDACTED] declare that the following is true and correct to the best of my knowledge and belief:

1. My name is H [REDACTED] I was born on [REDACTED] in San Pedro Necta, Huehuetango, Guatemala. Today is my birthday, so I am 17 years old. I am currently held in the immigration detention center for migrant children in Homestead, Florida.
2. My mother died when I was one year old. At first, my sister took care of me. Then another lady cared for me for five years or so. For the last year, I was living with my sister-in-law.
3. The language we speak among our family is Mam. I went to school for four years of primary school in Spanish, so I speak Spanish as well as Mam.
4. I left Guatemala on December 2, 2018. I travelled with some neighbors, but not with any other family members. I think it took about 20 days to reach the United States. I don't remember the exact date I crossed the border into the United States, but I know that I travelled through Sonora.
5. When I was near the wall, immigration agents apprehended me and took me to a cell. I spent one day there and was sent to another cell, where I spent another day. Then I was transferred to Homestead, to the place I am now. I don't remember the exact day I arrived here, but it was some time in December, so I have been here over three months.
6. When I arrived, the staff here told me the rules: when we have to get up, when we go to school, when we go to bed. We have to take showers. We have to walk in line. We can't touch anybody else. If we break the rules, we will get a report. The staff say that if we get a report, they will send it to the judge who decides whether we will stay in this country. They say the judge also considers how you behave in school. I've never received a report, but I'm concerned that I will get one and it will affect my case.

[REDACTED]

7. I'm supposed to get phone calls twice a week, on Mondays and Wednesdays. Today is Tuesday, and the last time I was able to make a call was last week, on Wednesday. The staff never called me to make my calls yesterday, even though I asked them. They said I would get called, but I never was.

8. The calls are for 10 minutes. It would be good to have more time. Some more time would allow me really to talk to my family and hear how they are. I feel as though I can't cover everything I want to talk with them about in 10 minutes.

9. I was just moved to the section for 17-year-old boys yesterday, because I turned 17 today. I felt more comfortable in the room I was before. My friends are there, and I don't know anybody in the new place where I am staying. It is really upsetting and disruptive to have to change where I am staying and leave the people I know.

10. I have a cousin who lives here in Florida who can take care of me. I know he has done his fingerprints, so we are just waiting to hear whether the government agrees to let me stay with him. I have not heard anything about my case or whether there is anything else I can do to make sure I can go stay with my cousin.

I make this declaration under penalty of perjury under the laws of the United States. This declaration was provided to me in English and read to me in Spanish, a language in which I am fluent.


Date: 31 / 2019

Certificate of Translation

I, MICHAEL BOCHENEK, certify that I am fluent in English and Spanish and that I read the above
declaration to H [REDACTED] M [REDACTED] in Spanish. Executed this [REDACTED] day of March, 2019, in
Homestead, Florida.



MICHAEL BOCHENEK
Human Rights Watch
350 Fifth Avenue
34th Floor
New York, NY 10118

Exhibit 56

Declaration of B [REDACTED] M [REDACTED]

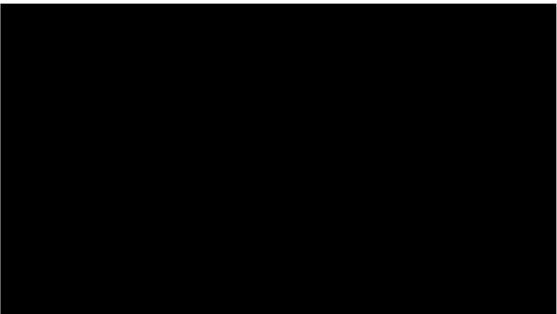
I, B [REDACTED] M [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I am from Santa Barbara, Huehuetenango, Guatemala. I speak Spanish and also Mam.
2. Back in Guatemala, I lived with my mother because my father was physically abusive to my mother and to me. We pressed charges and he was in prison for a while because of it. Now he lives with another woman and I don't have any contact with him.
3. I crossed the border in late October last year near Tucson, Arizona and turned myself in to the Border Patrol. They kept me for five days in a place we called the dog kennel. I spent a lot of time crying. The food there was bad, and not enough. It was difficult to sleep because we only had thin mattresses and aluminum blankets. I was hungry, cold and tired.
4. In early November, I took an airplane to Florida. I've been here in Homestead for almost five months. I'm still here because they won't approve a sponsor for me. First, we tried to get my uncle approved as a sponsor. He is the only family I have in the US. He's only 25 but very responsible. He lives in Tennessee. I had to wait two months to get his fingerprints approved. Finally, they said I couldn't go live with him because he lives with friends and because I didn't have any photos of me and him together.
5. When they denied my uncle's sponsorship, an older neighbor, a friend of the family who now also lives in Tennessee also said she would sponsor me. But they said because she's not family I can't go live with her. Now I don't know what to do. I think I'm going to ask for a voluntary departure to be sent back to Guatemala.
6. If I ask to be sent back, my social worker told me that I'll still have to wait four to six months here. It's such a long time and I've already been here for five months. That's why I'm thinking of asking this week so I can get out of here as soon as possible. If I stay here and wait to go to court, they said I won't be able to go until August 13.
7. Sometimes it's really hard having to stay here. A couple of girls since I've been here have been cutting themselves. That's why we're not allowed to bring pens or pencils into our

bedrooms. We're only allowed to have clothes and a few other things like a toothbrush and a hairbrush.

8. I have spent a lot of time crying and the other girls too. When the other girls cry, I try to tell them that they should try to be patient, focus on where they are now and to not think about the future or getting out to their families. But that's hard to do.

I, B [REDACTED] M [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



March 26, 2018

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to B [REDACTED] M [REDACTED] in Spanish. Executed this 26 of March in Homestead, Florida.



Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

Exhibit 57

DECLARATION OF C [REDACTED] G [REDACTED]

I, C [REDACTED] G [REDACTED] declare that the following is true and correct to the best of my knowledge and belief:

1. My name is C [REDACTED] G [REDACTED] I was born on [REDACTED] in California, Usulután, El Salvador. I am 16 years old. I speak Spanish.
2. Thirteen years ago, my father left my family for another woman. I only see him about once per year. My mother raised me.
3. My sister has a long-time boyfriend. Her boyfriend has a sister who moved to the United States a long time ago. She lives in Virginia. She is married to a man named Manuel Y [REDACTED] I knew them and was in touch with both of them using WhatsApp.
4. I started to have a problem with some gang members. They threatened me, attacked me, and hit me twice. I was going to be killed if I stayed there.
5. I left my country about six weeks ago and travelled here without any family or friends with me.
6. When I arrived in the United States, the immigration agents took all my clothes except the jeans and short sleeved t-shirt I was wearing. I was put into a cell that was about 8 meters around. There were forty to fifty other kids in the cell with me.
7. It was horrible in the cell. It was very, very cold, and I was not wearing enough clothes to stay warm. I had to try to stay warm with one aluminium blanket. We were only fed twice a day and I was very hungry.
8. Even though I was in that cell for four days, I was not allowed to call anyone. I wanted to call my mom and tell her I was OK.
9. After being in the cell, I was brought here, to the detention center in Homestead. I have been here about a month.

10. There are a lot of rules here. Some of the big ones are don't disrespect the guards, don't write on your clothes, and no talking to girls. If you break a rule, you get a report, and if you get too many reports, it slows your case down by 15 days. This means you have to wait 15 more days before you're allowed to leave.

11. I want to be released to Manuel Y [REDACTED] Even though my family is close with Manuel and his wife, the detention center will not let me go to them. I want to be released to Manuel, and I gave all his information to my case worker, but she told me he can't be my sponsor. She gave me three reasons why they won't release me. She said I can't go to the family my mother wants me to live with because Manuel and I don't have the same last name, Manuel doesn't send me money, and Manuel and his wife are not family because my sister and her boyfriend are not married.

12. Last week I was with one of the lawyers and I signed a paper agreeing to go into a program that will take me to another place like Homestead where I can go to school and stay until I'm 18 years old. I'm worried because some other kids have signed to go to this program and they've been waiting four months. I've been told it could be days or months until I go. I would rather live with Manuel and am worried about going into this program. But I'm scared to go back to my country and I don't have any other choice.

13. I'm also worried about what will happen when I turn 18. If I don't find another sponsor, I will be deported.

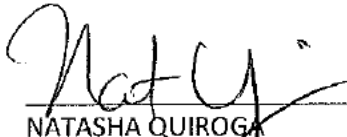
I make this declaration under penalty of perjury under the laws of the United States. This declaration was provided to me in English and read to me in Spanish, a language in which I am fluent.

[REDACTED]

Date: 05/28/19

Certificate of Translation

I, NATASHA QUIROGA, certify that I am fluent in English and Spanish and that I read the above
declaration to C [REDACTED] G [REDACTED] in Spanish. Executed this 28 of March, 2019, in Homestead,
Florida.



NATASHA QUIROGA
Lawyers' Committee for Civil Rights Under Law
1500 K St NW Suite 900
Washington, DC 20005

Exhibit 58

Declaration of

N [REDACTED]

P [REDACTED]

I, N [REDACTED] P [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED] I just turned thirteen years old last month. I am from Guatemala.
2. My beloved family members and I suffered the most awful abuses in Guatemala. After I was abused and at risk of being abused again, my parents decided that I needed to leave Guatemala for my safety. I left Guatemala on or about March 6, 2019. Whenever I think about why I had to flee Guatemala, I cry and cry.
3. I traveled to the United States without any of my family members. I do not know where I crossed the border or the date when I crossed the border.
4. After I crossed the border, I was taken into custody by border patrol officers and kept for about a day, after which I went somewhere else for about two days. Then I was taken to the detention center in Homestead, Florida, where I am now. I arrived here some days ago.
5. I would like to leave this detention center in Homestead and live with my aunt Aurelia F [REDACTED]. She lives in California and has been in the United States for about twelve or thirteen years.
6. I do not know how I can leave the detention center in Homestead. I want to get out of here as quickly as possible. I do not know why I am here. I do not know how to speed up the process that will let me get out of here. I do not know anything about the *Flores* settlement agreement. No one here has given me information about my release options under *Flores*.
7. I feel very sad here. Other children are sad here too. Some girls in my dorm Golf 6 have been here for months and months. I worry that I will be here a really long time too. I cry and cry about this and all the other things about where I am.
8. We are not allowed to leave Homestead. We must be with a YC (a Youth Counselor) who watches us all the time. Children here also cannot touch each other. I cannot give anyone a hug. I need to be comforted, but there is no way for that to happen here.

9. If anyone breaks a rule, a report will be prepared. If you get a lot of reports, they are going to be shown to the judge, and then deportation will follow.
10. I obey all the rules because I do not want any reports about me.
11. I am able to call my aunt Aurelia twice a week. My phone calls are limited to ten minutes. I wish that my phone calls with my aunt Aurelia could be longer. If I had more time to talk with my aunt Aurelia, I would try to figure out how to get out of the Homestead detention center more quickly. I need more time to talk with my family because I am so upset all the time and do not have anyone to comfort me. I think I would feel better about my situation, and not feel so isolated and so sad, if I could talk with my family whenever I needed to.
12. I do not have an immigration lawyer. I need asylum in this country to be safe. My uncle has murdered women and he has abused me and I am terrified of him. I feel alone here. I do not understand how to apply for asylum or what to do about court. It is very hard for me to tell what happened because I am still so scared.

I, N [REDACTED] P [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]

26 de marzo 2019
Date 03/26/2019

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to N [REDACTED] P [REDACTED] in Spanish. Executed this 26th day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

Exhibit 59

DECLARATION OF D [REDACTED] H [REDACTED]
[REDACTED]

I, D [REDACTED] H [REDACTED], declare that the following is true and correct to the best of my knowledge and belief:

1. My name is D [REDACTED] H [REDACTED]. I was born on [REDACTED] in Tegucigalpa, Honduras. I am 17 years old. I am now held in the immigration detention center for unaccompanied children in Homestead, Florida.

2. I entered the United States at the end of November 2018. I spent four days in an immigration cell before I was transferred to Homestead, to the place I am now. I arrived in this detention center on December 3, 2018, so I have been here 114 days.

3. When I arrived here, I went through registration and orientation. As part of registration, I received vaccinations and had blood and urine samples drawn. The doctors didn't tell me what the blood and urine samples were for. They didn't tell me what the results were, and didn't give me anything in writing afterward either. I have never been back to see them since I arrived, and they never told me they would call me back to give me the results.

4. As part of the orientation, the staff went over the rules with us. The rules include no bullying, respecting each other, don't look at the girls, don't fight with anybody, respect the YCs, tell the YCs if we need anything. If we don't comply with the rules, we will get a report. A report means something gets written into our record that the judge sees. The judge considers all the reports when deciding whether somebody gets a permit to stay in this country. This is what the staff members told us at the orientation.

5. The YCs take the opportunity to remind us of the rules when they think we need reminding. They advise us not to break the rules because of the consequences of a report. In addition to what we heard at the orientation, they also tell us that a report can mean we stay here longer. They tell us the

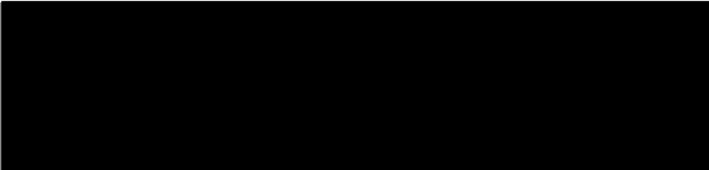
government considers the reports and our behavior when deciding whether to let us live with our family members.

6. We get phone calls twice a week. My days are Mondays and Wednesdays. After Wednesday, I have to wait until the following Monday, which is hard. I use the calls to call my mother, and I only get to speak to her for five minutes at a time. Five minutes is not enough. Talking to her gives me the strength to be patient and wait while I'm locked up here. She gives me the inspiration to be able to get through the time here, day after day. I ask her for advice, and I also want to be able to get news about my two brothers and two sisters, especially because I'm the oldest. I want to tell her about my case and get her thoughts about what I should do. Five or even ten minutes per call isn't enough for that.

7. Sometimes the YCs will act in ways that I think are unfair. They sometimes take away the friendship bracelets we've made. They'll just say, "That's not permitted." I don't understand why they do this. These are small things, but we make them ourselves, and they're something we can do to pass the time and distract ourselves. It makes me feel very bad when they take a bracelet I've made away from me without giving me any reason.

8. I hope other kids who come here are able to get more time for phone calls and can be treated fairly. I would like that myself, but I hope I will be with my family members in the United States soon.

I make this declaration under penalty of perjury under the laws of the United States. This declaration was read to me in Spanish, a language in which I am fluent.


Date: 3/27/2019

Certificate of Translation

I, MICHAEL BOCHENEK, certify that I am fluent in English and Spanish and that I read the above declaration to Da [REDACTED] in Spanish. Executed this 27 day of March, 2019, in Homestead, Florida.



MICHAEL BOCHENEK
Human Rights Watch
350 Fifth Avenue
34th Floor
New York, NY 10118

CERTIFICATE OF SERVICE

I, Peter Schey, declare and say as follows:

I am over the age of eighteen years of age and am a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 256 S. Occidental Blvd., Los Angeles, CA 90057, in said county and state.

On this date, May 31, 2019, I electronically filed the following document(s):

- EXHIBITS IN SUPPORT OF PLAINTIFFS' MOTION TO ENFORCE THE SETTLEMENT AGREEMENT [**REDACTED VERSION OF DOCUMENTS PROPOSED TO BE FILED UNDER SEAL**] VOL. 4 OF 5

with the United States District Court, Central District of California by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/Peter Schey
Attorney for Plaintiffs